

COMMENTS ON ISSUES

INTRODUCTION

This section addresses each of the issues identified in the analysis of public comments. The topics or issues are presented by logical groupings rather than by the numerical code listed with it. The code numbers were assigned during the analysis process as a tool for the content analysis team to categorize comments. The full coding system that was used can be found in Appendix A. In the following pages, each major issue is analyzed and selected quotes are included to reinforce the analysis. Not all quotes are included because there were so many; however, the intent of people's comments are reflected in the selected quotes.

FEDERAL REGISTER PROPOSED ACTION/PROPOSED RULE (100)

NEW INFORMATION ON THE IMPACTS OF THE NO ACTION ALTERNATIVE (101)

New Information on the Impacts of the No Action Alternative:

Many respondents are concerned that the "No Action (Natural Recovery)" alternative will not result in recovery of grizzly bears in the BE. According to FWS research presented in the FEIS, data collected during the past 20 years from more than 550 radio-collared grizzly bears indicates no bears have permanently moved from one occupied recovery zone to another. Quite a few respondents are concerned about the negative ecological impacts to the BE from not restoring the grizzly bear which is a keystone native species.

- "Under the No Action Alternative (Natural Recovery) proposed by Secretary Norton, it is very unlikely that grizzly bears will disperse from currently occupied areas and successfully repopulate the Bitterroot Ecosystem. More likely, grizzly bears will disperse to the area closest to their currently occupied territory, which are heavily used for management and recreation. For this reason, it is essential that wildlife managers aid existing populations by undertaking the restoration of grizzly bears into the Bitterroots, where human activity is minimal."
- "...the Secretary and all federal agencies have an affirmative duty to restore listed species. The FEIS and the ROD make plain that grizzly recovery is unlikely during the next 50 years without reintroduction. In the 25 years that the Service has been marking grizzly bears, only one bear has moved between ecosystems. Given the high likelihood than any bears that do move such great distances will be males, the likelihood for recovery without reintroduction is low. Moreover, the linkage report makes plain how fragmented the corridors between ecosystems are, which makes it even more unlikely that natural recolonization will occur. In our view, the "no action" alternative is paramount to a "no grizzly recovery" decision, and we believe it is illegal for the Secretary to make such a decision."

- “I am strongly in favor of the grizzly reintroduction and do not think the project should be abandoned. Adopting a "no action" policy when it comes to such magnificent wildlife could eventually lead to a "no possible action" policy because of its eventual extinction.”
- “Imperiled wildlife in the United States is not brought back from the brink of extinction by lots of talk but "no action.”
- “Our children and all future generations may look back at the current grizzly recovery effort as the critical decision which either supports or denies the survival of grizzlies. This decision not only impacts grizzlies, but the entire Bitterroot ecosystem. Major predators, as you know, play an extremely important role in the web of life in their native habitats.”
- “Grizzlies, being a top predator, signify the health and completeness of an ecosystem. Their reintroduction is an important step toward preserving and restoring this magnificent area. My husband and I travel for photography. The inaction of the federal and local governments will cause us to boycott this area in the future.”

Some people believe there is scientific evidence indicating that recovery of grizzly bears in the lower 48 States, and especially the Yellowstone Ecosystem, will be negatively impacted if bears are not reintroduced to the BE. A few respondents discuss the results of recent genetic research, which indicates the Yellowstone grizzly bear population will suffer from lack of genetic interchange and inbreeding depression within the next 30 years if no new bears immigrate and interbreed with the population. They also point to the FEIS information which indicates restoration of bears to the BE is key to recovery of the species in the lower 48. A third major population of grizzly bears (in addition to the Yellowstone and NCDE populations) would significantly increase the probability of persistence for the species in the lower 48, and would also guard against negative impacts to grizzly recovery from events such as food shortages and disease in the other populations.

- “There is also significant new scientific information that further supports the necessity and urgency of establishing a grizzly bear population in the Bitterroot Ecosystem. Genetic research conducted by Craig Miller and Dr. Lissette Waits of the University of Idaho indicates the Yellowstone grizzly bear population is genetically isolated and will likely suffer from inbreeding depression if there is no gene flow within the next 30 years (Miller et al., In Press). One of the management recommendations of their research is to establish a recovering grizzly bear population in the Bitterroots to provide potential for bear dispersal and genetic interchange with the Yellowstone grizzly population. Because Service documents estimate grizzly bear recovery in the Bitterroots will likely take 50-110 years, it is necessary to aggressively begin recovery efforts through immediate reintroduction,

such that population numbers will support dispersing bears within the time frame required by the Yellowstone population to avoid inbreeding depression.”

- “Finally, as reported recently in regional media, the Yellowstone population has been completely isolated for 60-70 years, has therefore lost substantial genetic diversity, with continued isolation expected to pose a threat to the species in as little as three decades. Given the well-documented threats to key Yellowstone food sources, we suspect demographic factors will imperil these isolated bears well before that. For the Service to knowingly take actions, which maintain that isolation and worsen this peril is clearly contrary to federal law.”
- “If the "no action" alternative is adopted and grizzlies are not reintroduced into this ecosystem, it is an implicit statement that this DOI believes that two moderately secure populations of grizzly bears are adequate to meet its obligations under the Endangered Species Act (ESA) for grizzly bear recovery. To the contrary, the National Wildlife Federation does not believe the existing populations are adequate to permit delisting of grizzly bears. A grizzly population in the SBE will increase the likelihood of persistence of four of the five existing populations. Studies presented in last year's Final Environmental Impact Statement (EIS) demonstrate that grizzly populations in the Selkirks, Cabinet-Yaaks, NCDE, and Yellowstone Ecosystem will be more likely to persist if a significant population is established in the SBE. The proposed ROD provides no scientific evidence to refute these studies and no such evidence exists. The SBE is situated in a position that makes it feasible that bears in all four of the current populations may be able to move through the SBE to establish genetic connections between the existing populations. For this to happen, bears need to be in the SBE and efforts must be made to preserve and enhance corridors between the SBE and other populations.”
- “The current populations of grizzlies are subject to genetic isolation and inbreeding without a population in the Bitterroot area.”
- “The Service's recently released linkage report underscores the importance of the Bitterroot Ecosystem in the larger picture of grizzly recovery. Because of its geographical location, it is the potential link between bear's populations in Yellowstone and those in northwestern Montana. Moreover, small grizzly populations like those in the Cabinets may be dependent on proximity to potentially larger bear populations like the one that could be established in the Bitterroot.”
- “Compared to their former range, there is very little grizzly bear habitat left in the lower 48 states, and if we want to preserve this wonderful animal, we, as a people, should try to establish as many stable populations as possible. This way, we will maintain the genetic diversity necessary for healthy continuation of our entire grizzly population. In addition, should natural disaster severely affect the survival chances of bears in one area, the effect on the total grizzly population would be reduced.”

A few respondents believe there are grizzly bears already inhabiting the BE. They question the FWS conclusion that there are no grizzly bears inhabiting the BE, and have seen no such bears in the last 50+ years. Some people have been conducting surveys for grizzly bears in the BE during the past few years. They also point to the recent documented movement of a subadult male grizzly bear from the Ninemile drainage of the Northern Continental Divide Ecosystem across Interstate 90 and into the BE for a day before it moved back into the NCDE. The bear was finally euthanized because it was a safety hazard for local residents after it became food-conditioned from eating garbage that was not stored properly. These respondents believe there is potential for immigration of grizzly bears to the BE and for natural recovery, and thus support the No Action – Natural Recovery alternative.

- “Recent Evidence Suggests the Presence of Grizzlies Already In or Near the Reintroduction Area. The recent killing of a depredation grizzly in or near the Bitterroot area suggests either the presence of bears in the area, or at least that bears might be close to returning to the area naturally. Either eventuality would obviate the need and purpose for reintroducing grizzlies into the Bitterroot Ecosystem. This new evidence of the possible presence of grizzly bears in or near the intended recovery area, gathered since the development of the Environmental Impact Statement, clearly supports the adoption of the No Action Alternative.”
- [Friends of the Bitterroot]... “continue to actively search for resident grizzly bears in the Bitterroot area. We are reasonably confident that they do live there. If and when we are able to document their existence, we would proceed to have them designated as threatened and deserving of all the protections given to every other grizzly bear in America.”

One respondent writes there would be additional costs associated with implementing the “No Action” alternative, above what was listed in the FEIS. They identify costs associated with additional public involvement, genetic sampling, and linkage zone establishment.

- “Under the newly proposed “Natural Recovery Alternative” the Fish and Wildlife Service would have to intensify efforts to verify the presence of bears, and improve travel corridors between ecosystems. This would require extensive public involvement processes as well as intensified agency cooperation. It would likely entail increasing hair sampling research monitoring surveys at the cost of hundreds of thousands of dollars. It would also likely cost millions of dollars to buy out and secure currently dangerous travel routes between Cabinet/Yaak, the NCDE and the Bitterroot to make them usable corridors a requirement of natural recovery. Also it would require that the Service review all proposals on federal land for Sec.7 consultation purposes, considering that any bear entering the Recovery Zone would be threatened.”

No New Information on the Impacts of the No Action Alternative

Several respondents comment there is no new significant information to contradict the scientific conclusions and decision documented the ROD, final rule and FEIS. They believe that without new information indicating the original decision was in error, the proposal to rescind the decision and reintroduction plan is without scientific, social or legal foundation.

- [The Nez Perce Tribe]... “ maintains that no new information is available to affect the decision selecting the Preferred Alternative.”
- “...we believe that the Service and the Department of Interior abrogated their responsibilities under the ESA by submitting to the state of Idaho's demands for no grizzly reintroduction and recovery efforts in the Bitterroot Ecosystem. Further, without any significant new and additional information that contradicts the conclusions and decisions documented in the Recovery Plan, Bitterroot Chapter of the Recovery Plan, FEIS, ROD, and Final Rule, a decision to rescind the reintroduction effort is without scientific, social, or legal foundation.”
- “... There is not a single biological reason stated in the notice of intent to deter the Service from its previously studied and signed decision.”
- “It is very unlikely that any biological or social changes have occurred in the area that were not addressed in the Endangered Species Act assessment made in November 2000. Therefore the previously passed decision, made after a 5-year public process in which over 24,000 individuals provided input or participated in review and revision should stand.”
- “I found it absolutely astonishing, after all the consideration and compromise that has gone into this, that a presidential election would overturn it all. The move to reverse the previous DOI decision, because of a new political philosophy, is unprecedented and dangerous. No new information has been raised--all of the arguments regarding potential impacts on local people have been considered and addressed previously. The only new variable is shortsighted politics.”

PROPOSAL TO SELECT THE NO ACTION ALTERNATIVE (102)

Comments that support the “No Action” alternative and oppose grizzly bear reintroduction in the BE:

Some respondents support the proposal to select the “No Action” alternative. They agree with the rationale listed in the NOI, specifically that there is a need to focus recovery efforts on existing grizzly populations, and that human and bear safety will be protected by not reintroducing them in the BE. A few mention they agree with Governor Kempthorne’s and the Idaho legislature’s opposition to the reintroduction. One person feels there is no need to translocate grizzly bears to the BE, with as many as already exist elsewhere. One person writes that FWS should focus their resources on other species that need more attention.

- (Idaho Governor Kempthorne)... “Idaho believes that the BE FEIS inadequately evaluated the factors discussed above and that the FWS’s decision to implement the No Action Alternative in lieu of the Preferred Alternative is the only proper course of action. The Secretary should not use her discretionary authority under section 10(j) to do substantially more harm than good.”
- “I support Interior Secretary Gale Norton's plan to take "no action" to restore grizzly bears to the Bitterroot-Selway, and to focus, instead, on recovering grizzlies where populations already are established.”
- “In summary, we of Lemhi County feel there is no justification whatsoever for the grizzly bear introduction. In fact, there are many reasons to indicate that the introduction would be extremely disadvantageous to all involved parties, including the bears themselves.”
- [Idaho Cattle Association]... “The ICA is strongly supportive of the "no action alternative" as proposed in the June 22, 2001 federal register notice. ... Due to the lack of support from the State of Idaho, the Congressional delegation, local governments and private citizens, the original preferred alternative was severely flawed. We feel that any decision made by the Department and USFWS that directly affects the people of Idaho must be supported by those elected to represent Idahoans.”
- “Please, Ms. Secretary, stand fast on your decision and leave the bears where they are.”
- “Everybody doesn’t get everything they want. I am with Gov. Dick Kempthorne and Sec. Gale Norton.”
- “On behalf of our constituents, and ourselves, we strongly support your decision to not introduce the bear.”

- “My letter is to express agreement with Secretary Norton's plan to take no action on introducing grizzly bears into the Bitterroot. I see no need in moving bears down there with as many who now exist in other parts of the continent.”
- “I support Secretary Norton's "no action" policy and suggest that the Fish and Wildlife Service concentrate its efforts on species where they can be more productive.”

One person comments specifically on the final rule to establish an experimental population.

- “If bears are not reintroduced there is no basis for maintaining the rule. We also support the withdrawal of the experimental population rule.”

A few comments discuss additional actions that should be taken by FWS if the “No Action” alternative is selected. Suggestions include not managing habitat to meet or exceed Forest Plan standards if there are no bears, and removing the east slope of the Bitterroot Mountains from the recovery zone.

- “Should the USFWS decide in this re-evaluation effort to select the No-Action Alternative as it was published in the Final Environmental Impact Statement (FEIS), March 2000, the ALC will reiterate the comments submitted on the record regarding this alternative. Those comments are: "ALC questions the need to manage habitat to meet or exceed existing Forest Plan standards for a population of grizzly bears that does not exist and by admission in the DEIS the possibility of existence is "remote." This is analogous to building and maintaining an elementary school without a population of school children."
- “The east slope of the Bitterroot Mountains is not appropriate grizzly bear habitat because of man's constant presence there, and should be removed from the recovery zone even under the No Action Alternative. The entire east slope of the Bitterroot Mountains should be managed under a zero tolerance policy for bear presence.”

Some comments do not mention the NOI proposal to select the “No Action” alternative specifically, but make the general comment that they are opposed to grizzly bear reintroduction in the BE. Most just state they do not want grizzly bears in the BE. Some include reasons for opposing grizzly bear reintroduction, such as concern for: increased land-use restrictions; predation on elk; and risks to human safety. Some people question the value of reintroducing the grizzly, and others believe the species is in no danger of extinction, making the proposal invalid.

- “We vehemently oppose the reintroduction of grizzly bears into the Bitterroot-Selway Wilderness.”

- “We do not want any more grizzly bears in Montana. We have to live with them.”
- “... leave the bears alone and away from people, where they belong.”
- “I say NO to any grizzly in the Bitterroot.”
- “We don't need more tying up millions of acres to accommodate a handful of bears.”
- “I am in favor of stopping grizzly bear recovery efforts in Idaho and anywhere else. The forest has done just fine without these predators for a number of years and will continue to do so.”
- “As a member of numerous environmental groups, I agree with your opposition to reintroduce the Grizzly bear to the wilderness of Central Idaho and Western Montana.”
- “Grizzly reintroduction should NOT occur in the state of Idaho. We are already seeing the ill effects of wolf introduction with no population control on the elk herds, and grizzly introduction would only compound the problem.”
- “I do not think it is wise or just to reintroduce these large predators to an area from which they were exterminated long ago.”
- “I was appalled by the lack of consideration for our lives and the lives of our children in this preposterous scheme. Keep the bears out.”
- “I do not want to be Bear food, or have anything to do with Grizzly Bears. They should stay where they are now. If you want to re-populate the bears, San Francisco, LA, New York City are good places, they can adapt to city life.”
- “I am not convinced that the Grizzly would contribute any significant value, except that intrinsic to its existence, to the western landscape, the environment or humanity.”
- “The fact that they are not in any impending danger of extinction, lack of evidence for a significant beneficial impact on the environment by their presence and questionable benefit to humanity gives us time to more carefully consider the reintroduction proposal.”

Comments from some local residents indicate they are opposed to grizzly bear reintroduction in the BE, and provide various reasons for their opposition. Most comments mention the Bitterroot Valley of western Montana and the Lemhi County area of eastern Idaho.

- “Take no action to restore grizzly bears to the Bitterroot Mountains of Western Montana and Central Idaho ... we have lived in Ravalli County since 1972...There is no way the grizzly would limit himself eventually from the valley.”
- “I am adamantly opposed to any introduction of grizzly bears in Lemhi County or any of Idaho.”
- “Keep the grizzly out of Idaho.”
- “Any proposal other than the No Action Alternative will place undue burdens on the Commenters' ability to conduct business activities in an environment safe from human/bear conflicts, injury and death, and livestock/bear conflicts, injury and death. In addition, the Commenters are concerned that well-established business activities at storage and diversion point sites as well as access routes will be interfered with in a significant way if any change in the status quo regarding bear presence occurs.”
- “We in the Bitterroot Valley agree with "No Action" alternative concerning the "Anti-social flesh-eating carnivores" Please stand firm against the economy running environmentalists lies. The people of Montana appreciate your efforts and applaud you.”

A few people oppose reintroduction because they believe there are grizzly bears already inhabiting the BE, and they don't want more bears.

- “We do not need any more grizzly bears in Western Montana and Central Idaho.”

One respondent does not support grizzly bear recovery in the BE under any plan, and suggests the FWS should take this opportunity to explore delisting the species within the Bitterroot study area.

- [Associated Logging Contractors]... “The ALC opposes reintroduction of the bear and feels that the BE should not be managed for grizzly bears under the ESA. Because the No Action Alternative still provides that should grizzly bears naturally disperse to the BE, they would be protected as threatened under the ESA, the ALC cannot support this proposal. The ALC respectfully asks that the USFWS take the opportunity provided by re-evaluating the ROD to explore delisting of the bear within the study area.”

Comments that oppose the “No Action” alternative and support grizzly bear reintroduction in the BE:

Many people write that they are opposed to the proposal to select the “No Action” alternative, and urge the FWS to continue with plans to reintroduce grizzly bears in the BE. Some believe the “No Action alternative will not result in recovery of grizzly bears in the BE and will negatively impact recovery of the species. They feel the selection of

this alternative would be contrary to the responsibility of the Secretary of Interior to recover endangered species under ESA (see Issue 202 - "ESA Authority/Responsibility for Grizzly Bear Recovery" for additional discussion). They also comment the Secretary cannot allow local officials to have veto power over recovery efforts of federally listed species. Some comment that years of expensive scientific research will be wasted if the "No Action" alternative is selected. Others believe the decision to take "no action" will negatively impact the ecology of the BE by failing to restore an important native predator.

- "The American people have a right to expect more than "no action" from the government officials on this important issue on which so much energy and expense has been expended."
- "We urge the Secretary to abandon the proposal to replace this ROD with a "no action" alternative that would leave this large area of suitable grizzly bear habitat in designated wilderness areas and adjacent national forests without grizzly bears. The Bitterroot Ecosystem is identified as a recovery area in the 1993 grizzly bear recovery plan. A decision to take no action on grizzly restoration in this area will delay the time when this species can be delisted and is contrary to the Secretary's responsibility under the ESA to recover listed species."
- "Interior Secretary Norton's proposal to rescind plans to reintroduce threatened grizzly bears to the Selway-Bitterroot Wilderness is ill conceived and demonstrates that she has no intention of upholding her confirmation hearing promise to fully implement the Endangered Species Act."
- "We are writing to voice our opposition, consternation, and deep disappointment regarding Interior Secretary Gale Norton's proposal to take no action to restore the grizzly bear to the Bitterroot Ecosystem."
- "We, [Society for Conservation Biology]... urge the Secretary to abandon the proposal to replace the ROD with a "no action" alternative that would leave this large area of suitable grizzly bear habitat in designated wilderness areas and adjacent national forests departure of grizzly bears, a dominate native carnivore."
- "We believe that Secretary Norton's plan to take a "hands off" approach toward grizzly management is wrong. It is a recipe for further declining numbers...We strongly believe that it would be a tremendous mistake for this nation to fail to set aside large tracts of land in the west where all the species that comprise an ecosystem can flourish."
- "After review of this proposed reevaluation of the ROD, we find that this decision made by Secretary Norton has no scientific basis and would seriously undermine grizzly bear recovery in the lower 48 contiguous states, further delaying the day when grizzly bear can be removed fro the list of endangered and threatened species."

Further, we find that the explanations offered as rationale for this reevaluation are grossly inadequate to justify the proposed major change in policy.”

- “I urge you to rethink your "no action" alternative for grizzly bear reintroduction. Having worked in the Cabinet Mountains and Yellowstone area, I recognize the profound influence that knowing those bears are out there has on the way you act when you are out there. Overwhelmingly, we were more focused on what surrounded us and our personal actions, both of which were very positive outcomes.”
- “The D.O.I. offer was "no action", with no reason. I guess its Politics. Can something be done to save these magnificent creatures?”
- “Please do not allow Interior Secretary Gale Norton and her political big business associates to stop your plans to bring the Grizzly back to the Bitterroot Mountains of Idaho and Western Montana.”
- “I am appalled and disappointed that you have chosen to rescind the Selway-Bitterroot grizzly bear reintroduction program. It is not consistent with your stated views regarding local control, and is a serious blow to the future prospects of grizzly in the northern Rockies.”
- “Further, We are deeply concerned with the apparent disregard demonstrated by the Secretary for a species that he is responsible for recovering. Although the Yellowstone NP has an estimated 400-600 grizzlies and Glacier NP has an estimated 300-400 grizzlies remaining, the other 3 populations (NW Montana, N Idaho, NW Washington) are dangerously small, ranging from 5-50 individuals each. We feel that any delay in recovering the Selway-Bitterroot Ecosystem population of grizzly bears is completely contrary to the given responsibility of the Secretary of the Interior to conserve and recover ESA-listed species and, further, that it could even be considered unethical not to do so.... we have an ethical responsibility to recover this (and all) species that are endangered or threatened. This is an important argument that should not be ignored.”
- “Under the original "No Action Alternative" now proposed as the preferred alternative in the current rule, expansion of grizzlies into the Bitterroot was not expected. The EIS clearly states that movement from extant populations to the Bitterroot ecosystem is "unlikely" (page 2-42), as female grizzly bears generally remain near their natal range and population expansion into new territories is very slow. Therefore, we believe that acceptance of the No Action Alternative is without scientific merit and does not support recovery of the species. In fact, after reading the EIS, it is nonsensical to conclude that the No Action Alternative is the preferred approach to recovery for grizzlies in the lower 48!”

- “Years of study by expert scientists, led by Chris Servheen, an authority in the field of Grizzly Bear Recovery may have been wasted when the Interior Secretary, Gale Norton took a “no action” position.”
- “... although we think it is an excellent idea to involve all interested parties (federal agencies, states, tribal officials, private companies, academics, etc.) in species recovery, and we are convinced that this has been done in this case, the Secretary cannot allow local officials to have what amounts to veto power over recovery efforts of federally listed species. Such a policy has grave implications for all listed species. As you should recall, if this policy had been followed in the 1990's there would have been no restoration of gray wolves (SBE and Yellowstone NP) and black-footed ferrets (WY, MT).”
- “The proposal to reverse the existing ROD is essentially a political decision, rather than one based on sound conservation science and appropriate acceptance of the DOI's responsibilities under the ESA...eight major scientific organizations involved in natural resource issues in the United States have jointly criticized the decision to take no action on grizzly recovery and have called for implementation of last November's ROD. Americans have a right to expect that the DOI will make decisions based on sound science rather than on mollifying fears that have been exaggerated by political rhetoric.”

Most respondents who disagree with the proposal to rescind the selected alternative and instead select the “No Action” write that they strongly support the plan to reintroduce grizzly bear with Citizen Management. Many urge the Secretary of Interior and FWS to reinstate the selected alternative to reintroduce grizzly bears under ESA section 10(j) with Citizen Management. They write that this plan is innovative and will involve local citizens, as the new Bush administration has said it favors. They also believe it is the best alternative to accomplish grizzly bear recovery in the BE.

- “The reintroduction plan selected in the November 17, 2000 ROD represents one of those rare occasions where a win-win solution was crafted. A decision in favor of the No Action Alternative would reverse a positive decision that was made after six years of effort, extensive public involvement, overwhelmingly favorable comments, and a considerable expenditure of federal resources. It would also mark the first time that a completed ROD has been withdrawn by the Service. Withdrawal of the ROD in favor of “No Action” would be a waste of the considerable resources committed to developing an exceptional plan and, more importantly, it would fail to promote recovery of the species.”
- [The Nez Perce Tribe]... “opposes FWS decision to withdraw the Final Rule adopting the Preferred Alternative for grizzly bear recovery in the Bitterroot Ecosystem. The No Action alternative ignores the agency's own findings in the ROD, public sentiment, and sound science. As such, the Tribe urges FWS to implement the current Final Rule as written and restore the grizzly bear to east-

central Idaho and a portion of western Montana as a non-essential experimental population.

- [The Idaho Chapter of the Wildlife Society]... “ recommends proceeding with efforts to reestablish the grizzly bear in the Bitterroot ecosystem under the preferred alternative in the FEIS. We believe Secretary Norton's proposal to withdraw this scientifically sound and comprehensive reintroduction plan and select the No Action alternative is both scientifically and legally flawed.”
- “Abandoning the above restoration plan would waste the years of effort and thousands of dollars already spent to determine that grizzly bears should be restored to Idaho.”
- “Please consider going ahead with the grizzly plan in the remote public lands in the Bitterroot Mountains of Central Idaho and Western Montana.”

Some comments simply support grizzly bear reintroduction in the BE, and do not mention the NOI proposal or any specific alternative. Reasons given include: the need to restore this important keystone species; the obligation of humans to restore a species that they extirpated; and the challenge to the wealthy USA to restore an exterminated species like other less-wealthy countries have done.

- “Count mine as a voice in favor of the bears and the quality of life in the communities sharing this spectacular ecosystem.”
- “In several other countries, much less wealthy than the U.S., populations of carnivores, including bears, have been reintroduced into ranges where they had been exterminated. In the U.S. we've done this with wolves, in a very successful but also controversial program. Reversing the decision to reintroduce grizzly bears into the Bitterroots is, I think, even worse than not having made the decision in the first place: this reversal conveys to the rest of the world that although the reintroduction (1) is a biological imperative, (2) could be conducted in an area and in a way that had minimal effect on people, (3) would be monitored by the very groups that were concerned over potential impacts, and (4) was viewed as important by a vast majority of the American public, a new political administration could stamp it out.”
- “While I am not a proponent of the Service's selection of the "preferred alternative," some action is better than none, when it comes to recovering this crucial pinnacle predator species”
- “Please support the reintroduction of grizzlies to the Bitterroot-Selway wilderness. Because society's lack of environmental awareness and conservation has caused this situation, maybe this would be a way to reverse our mistakes in the past.”

Some respondents support grizzly bear recovery and suggest the FWS select and implement the Conservation Biology Alternative (Alternative 4) instead of the “No Action” alternative.

- “In summary, we remind the Service that it is obligated under the law to recover grizzly bears; to do so based on the best available science; to take into account the views of all Americans; and to seek, and fight for adequate funding to do the job. Therefore, we ask that you withdraw the ill-conceived "No Action" Proposed Rule and replace it with the Conservation Biology Alternative, which meets all of the above objectives, and leads most clearly and effectively to grizzly recovery in the lower 48 states.”
- “I am in favor of "no action" with regards to the Fish and Wildlife Service's decision for grizzly bear introduction in Central Idaho and Western Montana and encourage the Service to adopt Alternative 4 of the FEIS. This alternative would allow grizzly reintroduction activities to proceed while giving grizzlies in the area the full protections of the ESA and conserving their habitat.”

One person wrote the grizzly bear recovery program needs further study and increased emphasis on public education.

- “The whole U.S. grizzly bear activity needs to be completely studied and the public needs to be educated on the facts.”

REASONED DECISION (103)

Comments that Disagree with the NOI rationale for re-evaluating the ROD and selecting the “No Action” alternative:

Comments that generally disagree with rationale:

Many respondents question the rationale listed in the NOI for reevaluating the Record of Decision and for proposing to select the “No Action” alternative. Some comments are generally in disagreement with the rationale, and do not critique specific issues from the NOI. A number of these general comments include criticism that the NOI proposal lacked scientific analysis and rationale for selecting the “No Action” alternative. Some of these comments concerning the issue of “best available science” will be included here, but the majority of comments on this issue are summarized under “Issue 110 – Best Available Science.” Most comments also express support for the reinstatement of the selected alternative (Alternative 1), and conclude there are no logical reasons to abandon this recovery plan.

- “The Service states in the proposed ROD for the Grizzly Bear Recovery in the Bitterroot Ecosystem Environmental Impact Statement (EIS), "establishment of an experimental population is a discretionary action". We believe this assertion is

inaccurate. The volume of scientific data, analysis, and conclusions presented in the above-mentioned documents indicate the recovery of grizzly bears in the Bitterroot Ecosystem is not discretionary, given the statutory requirements of the ESA, and the congressional mandate of the Service to recover and conserve listed species and the ecosystems upon which they depend. Further, the proposal to select the No Action Alternative is inadequate to meet the Service's legal requirements under the ESA to recover grizzly bears in the lower 48 states. As stated above, all scientific conclusions reached by the Service thus far indicated recovery of grizzly bears in the Bitterroot Ecosystem is necessary, recovery will not occur naturally, and reintroduction will be required.... [All USFWS NEPA documents] conclude that grizzly bear recovery will require reintroduction of bears from other areas because natural recovery is highly unlikely given scientific data collected from 575 radio-collared grizzly bears over the last 25 years.”

- [The Nez Perce Tribe]... “No Reason is Provided for Selecting the No Action Alternative. As a threshold matter, no reasoning is provided in the Notice of Intent dated June 22, 2001 for withdrawing the Final Rule. Simply stating that FWS "has determined that it is not prudent to recover grizzly bears in the Bitterroot ecosystem is unsatisfactory. Without further analysis or explanation behind FWS's decision, this action is arbitrary and capricious and otherwise not in accordance with applicable laws...in addition to consultation with states and local governments, the FWS has an obligation to engage in meaningful government-to-government consultation with affected tribes...Not only did this consultation not occur, the Notice of Intent fails to recognize the necessity of future consultation with Tribe during any further discussions regarding grizzly bear recovery. This contradicts the Final Rule's guarantee that grizzly bear recovery will be undertaken "in cooperation with...the Nez Perce Tribe." Final Rule at 8. Should any additional discussion regarding grizzly bear recovery take place, the Tribe must be consulted and be involved in all decision-making regarding the future of grizzly bear recovery operations.”
- “The Record of Decision withdrawal and the proposed rule also cite the well known and previously considered "objections of the states that would be affected by reintroduction of grizzly bears in the BE" and strong opposition by "some citizens potentially adversely affected by this action" as justification for the proposed withdrawal (Federal Register, p. 33620). But the proposed withdrawals of the regulation and Record of Decision provide no basis for why the existing Record of Decision and final regulations are no longer prudent or consistent with the Service's recovery priorities.”
- “The stated reasons for rejecting the existing ROD are invalid. The public record clearly reflects that the main reason the DOI is proposing to abandon grizzly bear recovery in the SBE is to mollify the governor of Idaho who has based his adamant opposition to the recovery plan on his position not to have these "flesh-eating carnivores," in his words, returned to public lands in the Bitterroots. The Secretary's position in this regard raises the specter of whether it is the policy of this DOI to grant state-elected officials an effective veto power over enforcement of the ESA.”

- “I would also like to add that I live up in the Rockies. I know a lot of the ranchers that are against things like this like to say that the people that vote for the reintroduction of predators don't live in the areas, but I do. And I am 100% for it. If you don't want to live with the animals that live or lived in their area then they need to move to the city, and not out into the country. These animals belong here, who are we to decide what lives where and when.”
- “All the reasons the FWS have suggested to oppose the reintroduction are not sufficient.”
- “I am not an activist and this is the first such correspondence I have ever submitted, but please help me understand why Interior Secretary Gale Norton has halted the introduction of the declining Grizzly Bear population into the Bitterroot mountains.”
- “Limited reintroduction of grizzly bears into this wilderness area is a good idea. There is no real sensible opposition, which can be presented rationally. 25 bears in millions of acres can't make much of a difference to man/humans.”
- “We are astounded that a concept that took local citizens several years to build, a proposal that the Fish and Wildlife Service itself advocated at every opportunity for over four years, could be rejected by a new administration after a few weeks of review and no hearings or discussions with local publics and without consultation leading scientists or member of the Interagency Grizzly Bear Committee. Hundreds of people spent hundreds of hours of their time building this proposal, expanding it a public meeting and participating in public hearings. It is a mockery of the NEPA process to think that such a powerful public record can be erased via one notice in the federal register. This decision is transparently arbitrary.”
- “No reason to reconsider. Nothing material has changed since last November's Record of Decision. The public has already been heard. Over 24,000 citizens filed comments. Two thirds of those who filed personal signed comments were from the local counties that include the Bitterroots. The Fish & Wildlife Service (FWS) has spent over half a million dollars to complete the NEPA process. Your claim that there is now "significant opposition" is nothing new. That opposition has always existed. It was considered in the EIS and Record of Decision. There is no reason to reconsider that decision.”
- “This position supports only a small number of U.S. citizens who have vested interests in retaining cheap grazing land and is detrimental to the rest of the nation's citizens.”

Some comments criticize the NOI proposal because it lacks scientific analysis and rationale for selecting the “No Action” alternative.

- “Under the original "No Action Alternative", now proposed as the preferred alternative in the current rule, expansion of grizzlies into the Bitterroot was not expected. The EIS clearly states that movement from extant populations to the Bitterroot ecosystem is "unlikely" (page 2-42), as female grizzly bears generally remain near their natal range and population expansion into new territories is very slow. Therefore, we believe that acceptance of the No Action Alternative is without scientific merit and does not support recovery of the species. In fact, after reading the EIS, it is nonsensical to conclude that the No Action Alternative is the preferred approach to recovery for grizzlies in the lower 48!”
- “Indeed, there is no evidence whatsoever in your Federal Register Notice that science, the habitat, or the status of the species has prompted this reversal.”
- “After review of this proposed reevaluation of the ROD, we find that this decision made by Secretary Norton has no scientific basis and would seriously undermine grizzly bear recovery in the lower 48 contiguous states, further delaying the day when grizzly bear can be removed from the list of endangered and threatened species. Further, we find that the explanations offered as rationale for this reevaluation are grossly inadequate to justify the proposed major change in policy.”
- “The Society for Conservation Biology finds the explanations offered in the "no action" proposal inadequate and unconvincing.”
- “The "no action" alternative flies in the face of virtually uncontradicted scientific evidence pointing to the fact that the Bitterroots are ideal grizzly habitat, and the absolutely best place to reintroduce grizzlies to assist in their recovery. It would be tragic to lose this opportunity, particularly when the only credible basis for the "no action" alternative is politics rather than science and reasonable wildlife management.”

Comments that disagree with and question specific rationale:

Some respondents comment on and disagree with specific rationale. These are grouped and summarized below.

Inadequate Public Involvement

- “Lack of Support/Fear For Safety: Both of these claims are directly contradicted by scientifically gathered evidence and represent little more than poorly disguised efforts to meet the desires of Idaho Governor Kempthorne and small minorities in the two states that are pro-industry and anti-grizzly. In July of 1995, ...the Service contracted with Responsive Management, a professional polling firm...They found that 62% of locals were supportive of reintroduction, while only 26% were opposed. At the regional and national levels, support was even higher at 74% and 77% respectively. In addition, they found that only 12.5% of those responding cited human safety as an issue, while 81-85% said the presence of grizzlies would not

affect their number of trips to the area. Finally, only 7% of those responding expressed a fear that grizzly reintroduction would result in “land use restrictions.”

- “From the vast number of articles and research we have done, there appears to be no cogent, logical reason to thwart this important initiative. Although seemingly controversial it is quite clear the plan has won overwhelming support by the US Fish and Wildlife Service, the local business community surrounding the wilderness area and the local public interest organizations.”
- “The original proposal survived years of scientific study, extensive negotiation with all concerned parties and rigorous public review. Objecting citizens had ample opportunity to present their case.”
- “The very public process has already included comments and input from those opposed to the plan. A late decision now to ignore the overwhelming scientific and public comment favoring reintroduction is not right!”
- “Her decision does not, in my judgment, reflect the wishes of most Americans.”
- “I am opposed to the Fish and Wildlife Service's decision not to reintroduce the grizzly bear to the wilderness of Central Idaho and Western Montana, especially after the years of work, debate, and previous public comment that had seen a consensus among a multitude of desperate groups in favor of reintroduction.”

Inadequate Funding for Bitterroot Recovery

- “Funds Are Available for Bitterroot Reintroduction. The Service states that it lacks budget to pursue reintroduction, but makes no mention of funds that have been provided in the past, or funds that have been committed for the future. Conservation groups have already developed a strong record of support for Bitterroot grizzly recovery. We have provided funds to do an assessment of potential food attractants for bears in the Bitterroot ecosystem, we have provided funds for alternate garbage devices, and we have worked with outfitters on providing alternate food storage containers. ... Perhaps most importantly, Defenders of Wildlife and the National Wildlife Federation last year met with the director of the Fish and Wildlife Service and presented her with a written commitment from a major foundation to share the cost of Bitterroot grizzly restoration on a 50/50 basis. Conservation groups have made plain to the Service that we are serious about equal sharing of the costs of the Bitterroot grizzly reintroduction, but that is never mentioned in the cost calculations. ... The Service has told us that reintroduction would cost approximately \$250,000 per year. If we pay half that means the Service has to come up with \$125,000, out of its x million-dollar budget to meet this important, high-visibility recovery objective. Given that the Service has spent nearly a million dollars over the last six years doing the paperwork on this reintroduction, their excuse that they have no money rings

rather hallow. It's just a convenient justification for not meeting ESA responsibilities.”

- “Lack of Funding To Initiate Reintroduction: As the Service and conservationists well know "Crying Poverty" is a time honored agency tradition when faced with a politically difficult task that they are reluctant to initiate. In most cases the agency at least requests insufficient funds, fails to support the request and then cries poverty when the dollars don't materialize. Here, however, the Service didn't even make a pretense of seeking appropriations - essentially telling staff that "if they supported reintroduction they could find the dollars in their current budget." The ESA has no exemptions for such self-inflicted funding shortfalls.”
- “The implication that the FWS is presently conducting and funding the nine recovery activities listed in the Federal Register needs clarification. Our inquiries to the Grizzly Bear Recovery Coordinator's office indicate that none of these activities have been funded as budget line items. Similarly although examples are provided of recovery activities that may be given priority, none have been funded.”
- “The stated reasons for abandoning the plan to reintroduce grizzly bears to the Bitterroot Ecosystem are unconvincing. The cost of \$2.1 million over 5 years (\$420,000/year) cannot be significant for a country with enormous wealth of the United States. We note that grizzly (brown) bear reintroduction efforts have been taken in countries like Italy and Austria that have far and fewer resources and where ecological conditions are less favorable for success than exist in the Bitterroot ecosystem. Certainly the United States should be able to do as much as these countries to restore this species which has been eliminated from 98% of its habitat south of Canada and is listed as "threatened" under the US endangered species act.”
- “The proposed ROD suggests that, due to the budget shortages, it is inappropriate to proceed with the Bitterroot recovery effort. There is little question that the project would be relatively expensive (given the inadequate budget allocated for endangered species recovery) and that there are many other demands on the Service's recovery efforts. However, an attempt to move the project forward using the citizens management committee and experimental nonessential status of the population may have provided alternative and less expensive ways for Bitterroot grizzly bear recovery to proceed. For example, Tribal and public management involvement and responsibility could have resulted in significant donations and financial support from private and non-government cooperators and foundations. The Service has already invested significant amounts of time and money on the environmental analysis and studies leading to the FEIS and ROD. Unfortunately, it may now find itself spending more of its limited dollars in court to defend the effort to rescind the decision than what it might cost to implement grizzly bear recovery on the ground in Idaho.”
- “The Society for Conservation Biology finds the explanations offered in the "no action" proposal inadequate and unconvincing. The concerns over costs are

insignificant, considering the importance of this conservation initiative and the size of Interior's budget. We could welcome increased emphasis and funds allocated to recovery of the existing populations, but have seen no proposal to do so and note that the final ESI specified that BE grizzly restoration would not use funds allocated for recovery efforts on existing populations.”

- “A lengthy and expensive EIS process will be wasted as a result of this decision.”

Other Recovery Priorities

- “Need to Focus on Yellowstone and Glacier Ecosystems: First, there is no scientific evidence to suggest that grizzlies in the lower 48 states can be recovered to viable levels over the long term by concentrating on these two populations. In fact, the best available science, repeatedly supported by independent grizzly biologists and population ecologists throughout North America, tells us the exact opposite - that a number of healthy, linked populations is the only way that recovery can ever be achieved. Second, it is widely accepted in the scientific community that viability will require 2-300 grizzlies in an interconnected metapopulation structure. As the Service is well aware, the most optimistic estimate of the combined Yellowstone/Glacier population would only total perhaps 1200 bears. Thus, the Selway-Bitterroot and its 300+ grizzlies is vital, both in terms of its numbers, and as the critical linkage between Glacier and Yellowstone.”
- “The Notice states that the "Service believes that addressing identified recovery needs in ecosystems that already contain bears is a high priority", and it cites as examples of high priority activities the ongoing efforts to estimate population size in Yellowstone and the Greater Continental Divide ecosystems and to finalize and print the interagency Conservation Strategy for management of bears inside the Yellowstone ecosystem after delisting. We agree that the Service should certainly prioritize its efforts and expenditures to maximize species recovery. However, the examples cited as "high priorities" are directed at documenting recovery rather than achieving recovery. In reality, reintroduction is the only proposed action that will move the species closer to recovery and delisting.”
- “Continuing and enhancing current recovery efforts in the other US grizzly bear populations is unquestionably important. The gains toward overall grizzly bear recovery remaining to be made in these ecosystems are relatively small compared to the large gains that could be realized from a restored grizzly bear population in the Bitterroots.”

Human Safety Risks

- “Finally, we understand that the Secretary also wishes to reexamine concerns regarding human safety issues. We believe that this concern is unreasonably inflated, and will take this opportunity to make a silent point regarding the true risks

of grizzly bears to humans. Although many people, including Idaho Governor Kempthorne, view grizzly bears as "massive flesh-eating carnivores" that pose such a great threat to humans, healthy grizzly bears actually pose little threat to the informed visitor to bear country. The grizzlies of Yellowstone NP are a great case in point. From 1980 to 1994, over 600,000 visitor nights in backcountry and thousands of trips yielded only 21 grizzly related injuries, and there have only been a grand total of 5 grizzly-related deaths in Yellowstone NP since it was established in 1872! Another example that works well for the SBE is the Bob Marshall Wilderness in Montana. The Bob Marshall Wilderness is similarly remote wilderness area which experiences a level of human use similar to that of the SBE. Since 1959, only one human injury and one human death from grizzly bear attacks have occurred, and the death resulted from a hunter who shot and wounded the grizzly bear first. This example speaks for itself and clearly demonstrates that the fears of Governor Kempthorne and others are unfounded. If you put this mortality level in perspective, many more people are killed every year either by domestic dogs, poisonous snakes, bees or lightning than were ever killed by grizzly bears over record time. Most of the small numbers of grizzly-induced human deaths over the years have been a result of careless human practices or human error."

- "The objections of Governor Dirk Kempthorne are without foundation. If we are to use the miniscule risk of human injury or death to keep grizzlies off of public land, then we might as well close down Sun Valley ski resort, and all ski resorts in Idaho since they are all on federal property. I practiced orthopedic surgery in Sun Valley for ten years where I saw ten to twenty injuries per day from skiing, many of them devastating injuries that changed the victim's lives forever. And we had several deaths per year from skiing accidents. So if we are to limit use of public land to only safe activities, then close the ski resorts. And while we're at it. Let's prohibit the use of all terrain vehicles on public lands, since more people are killed each year in Alaska by ATV's than were killed during the entire twentieth century by bears."
- "The Idaho governor's argument that any risk of injury to humans is unacceptable is ludicrous. In public health, for example, we deal constantly with concepts of relative risk and acceptable risk, realizing that yes; sometimes an extremely low level of risk to human health is acceptable in pursuit of public good. Grizzly recovery is such a public good, and needs to be followed through on by immediately reviving the recovery plan."
- [The Nez Perce Tribe] "The Decision to Select the No Action Alternative Ignores common Sense. The Preferred Alternative ensures that the recovery area is in the most remote portions of the Bitterroot Ecosystem, far removed from national parks and inhabited areas. Due to the low density of bears being reintroduced, the risk of human-bear or bear-livestock interaction is even further removed. Grizzly bears are primarily vegetarians, and few documented cases of bear-induced human mortality exist. The FWS has projected that, based on 280 bears existing in the Bitterroot by 2115, an estimated one injury will result per year and less than one grizzly bear-induced mortality every few decades. Final Rule at 21. In fact, horses cause greater

human injury and mortality per year than grizzly bears. ... Moreover, grizzly bears may eventually expand into the Bitterroot Ecosystem on their own. Should the bears return to their historic habitat, they will do so under conditions less favorable or controllable by local citizens or governments than those offered under the Preferred Alternative.”

- “The stated concerns over public safety are also unconvincing. Based on extrapolations from areas with similar conditions, the frequency of human deaths or injury from grizzly bear attacks from a recovered population in the Bitterroot will be extremely rare. Overall, there is an average of about 3 human deaths caused by bear attacks per year in all of North America from polar bears, black bears, and grizzly bears. In the Bob Marshall wilderness area of Montana, which is most similar to the wilderness areas in the Bitterroots, there has not been a human mortality from a grizzly attack since 1959.”
- “Further Consideration of Public Safety is Not Warranted. While the Federal Register notice withdrawing the reintroduction decisions suggests that further consideration of public safety is warranted, it offers no data or information to support such a conclusion. In fact, the draft and final EIS's offer voluminous statistical information on why concerns about public safety are NOT warranted. We believe that despite powerful evidence to the contrary, the Service is acceding to Gov. Kempthorne's misinformed viewpoint on the danger of grizzly bears.”
- “I grew up in Montana and still consider it my home. The reintroduction of grizzly bears is a sound scientific plan. The excuse that the governor of Idaho makes for opposing this plan is the safety of Idaho citizens. This issue of safety is not well founded. I have been around grizzlies on several occasions even while working in Glacier National Park. I have never been threatened and in all the instances that I am aware of, grizzly attacks were the result of bad human decisions or a mother protecting her young. I have always known since I was very young that wilderness areas always involve risk either from weather, terrain or wildlife.”
- “The Society for Conservation Biology finds the explanations offered in the "no action" proposal inadequate and unconvincing. The concerns over public safety from a restored grizzly population in the BE are also overplayed. In similar habitat in Montana's Bob Marshall Wilderness area, from which bears were never exterminated, there has not been a human fatality from a grizzly bear attack since 1959, and the EIS estimates the likelihood of a human fatality following full recovery in the BE at perhaps 1 every 2-3 decades. This contrasts with the highest cause of preventable death to Idaho residents under age 75, which is illness derived from tobacco use, which killed 1,645 Idahoans in 1997. Public health concerns should be directed to significant problems rather the exceedingly small possibility of death or injury from a grizzly bear attack.”

- “It is unfortunate that the human safety issues - which are unquestionably of vital importance in this matter - have been vastly exaggerated to the detriment of a reasoned and fair consideration of the grizzly recovery plan. Any human injury or loss of life related to a wildlife recovery effort is a tragedy, and recovery efforts should be designed with aggressive measures to minimize the potential for conflicts between people and the wildlife population being recovered. The citizen management grizzly bear recovery plan adopts just such aggressive measures to minimize potential conflicts between people and bears. For one of several examples, the plan authorizes the relocation, and in extreme cases the elimination, of bears that might pose a threat to people or livestock.”

Lack of Local Involvement in Decision

- “The original EIS and ROD for grizzly restoration in the Bitterroot Ecosystem proposed a restoration plan that was unprecedented in the amount of authority and involvement provided to local citizens in the reintroduction area in the management of the restored grizzly population. It is especially unfortunate that the Secretary of Interior has rejected this plan that found significant agreement among people with disparate opinions about grizzly restoration. This local involvement was a potentially valuable new model for implementing recovery efforts for such locally controversial species as grizzly bears.
- The biggest benefit of the program to reintroduce grizzlies to Montana and Idaho is establishing a pattern of "cooperation and mutual involvement between private citizens and federal government personnel." This mutuality of objectives and actions is a goal to reach for in "all" our environmental actions--only by securing citizen cooperation does the government (of and for the people).”
- “I am also rather surprised at her position, given that she is supposedly an advocate of local, citizen management of local issues.”

Disagree with All Rationale

- “In your Reevaluation of the ROD you state, "In light of our current recovery needs for grizzly bears in other areas and our available resources, as well as the objections of the states that would be affected by the reintroduction of grizzly bears in the SBE, we are reevaluating our prior decision." We can find no scientific basis to explanation whatsoever, and further, find that it can be refuted on each count. Regarding current recovery needs for grizzly bears in other areas, this is a myopic and scientifically inaccurate way to look at the big picture for grizzly bear recovery in the lower 48 contiguous states. The big picture is that grizzlies of the lower 48 contiguous states are to be viewed in their entirety, not as isolated islands. The reintroduction of grizzlies in the SBE represents a golden opportunity to bridge widely isolated grizzly bear populations in the northwestern US, thereby greatly increasing their chances of long-term survival. Focusing on one isolated population

such as the Yellowstone population...absolutely is not the way to approach this problem. Regarding costs, the current administration will spend over \$300,000 on grizzly bear recovery in FY2001, yet has budgeted none of it for the SBE recovery effort. We question the wisdom of this considering everything we know about how important the SBE is to grizzly bear recovery. Further, the final EIS specifies that the SBE grizzly bear reintroduction would not take away from funds allocated for recovery efforts of existing populations, so the proposed reintroduction does not impact recovery funding of existing populations. Regarding the objections of states that would be affected by the reintroduction, we understand that Idaho is the state objecting to this plan. It is apparent from the record of this entire EIS process over the years that Idaho was given every opportunity to participate in this reintroduction, and was to have members on the Citizen Management Committee that was to oversee the reintroduction. We aren't sure what more Idaho wants, and it's clear that consistently rejected opportunities to participate in the process and would not compromise. We do not question that states should be closely involved in projects such as this, but at what point does it extend beyond reason and federal law? We feel that it has clearly extended beyond reason in this case. Although some opponents of grizzly bear recovery make the argument that this is a states rights issue, here is no question that when it comes to the ESA, this ultimately is a federal issue, and the federal government, after involving the states and other interested parties, has to step up, take responsibility, and do the right thing."

- "Secretary Norton's decision to withdraw this well researched and comprehensive reintroduction plan has no sound basis. The stated concerns about the safety of inhabitants in or near the Bitterroot ecosystem are insufficient to justify the proposed change in policy. Nowhere in the endangered species act is federal inattention to listed species mandated by safety considerations. Also, the recovery efforts of existing populations would actually be helped rather than hindered by the reintroduction of grizzlies into the Bitterroot ecosystem, according to data presented in the FEIS. Finally, resources used for current recovery efforts would not be diverted to the Bitterroot reintroduction. Neither project would come at the expense of the other."
- "Neither prioritization among recovery efforts nor funding priorities for recovery provide adequate reasons for revocation of the Record of Decision. If the same reasoning proposed for revocation of the recovery program in the Bitterroot is followed to it's logical conclusion, then recovery decisions for other grizzly bear populations of lower priority for recovery or funding would also be considered for revocation. Certainly, the Department of Interior is not contemplating such actions, but neither should it do so with the Bitterroot Record of Decision. Both funding and recovery efforts for the reintroduction of grizzlies in the Bitterroots were designed to be separate from funding and recovery efforts for other grizzly bear populations, according to statements by the Department of Interior in the Final Environmental Impact Statement (FEIS:eg. pg 5-20[4]). Furthermore, funds for state programs associated with the reintroduction would be provided to the states (FEIS, p 5-50 [4])

Therefore, funding and reprioritization among recovery plans should be a moot issue.”

- “We believe the selection of the preferred alternative was based on sound science and there are no legitimate reasons for changing the preferred alternative. The 2 reasons given for changing the alternatives were limited resources that need to be prioritized to other areas and objections by the state of Idaho. Being quite familiar with recovery operations and needs of bears in other recovery areas, we believe there is no reason that recovery in the BE should negatively impact bear recovery in the other areas but in fact should greatly enhance it. A meta-population of bears with connectivity among populations will be created and genetics a long term population viability will thereby be greatly enhanced. Adequate resources will remain in place in the Yellowstone and Northern Continental Divide ecosystem for management even with reintroduction occurring in the BE. Additionally, other non-federal sources of funding are available to assist the BE reintroduction to further ensure this. ... The second reason given for changing the preferred alternative was objection by the state of Idaho. Idaho argues that the impacts of reintroduction will be too great for the state to endure. However, the specific concerns of Idaho were addressed adequately in the FEIS for Grizzly Bear Recovery in the BE. Based on the best information available, impacts of reintroduced bears on ungulates, livestock, humans and land use in the BE were predicted to be minimal (USFWS 2000).”
- “The DOI's concern about costs of the grizzly bear restoration effort are similarly misplaced since the existing ROD makes it clear that funds for grizzly recovery in the SBE would not be taken from existing recovery programs in the existing populations. In addition, we believe that restoration of grizzly bears in the Bitterroots would be a major step toward recovery of grizzly bears south of Canada. In contrast, progress toward recovery that can be achieved in the existing populations - although important - will be relatively minor because grizzlies already occupy most of the best habitat. This is not the case with the SBE.”

Comments that AGREE with the NOI rationale for re-evaluating the ROD and selecting the “No Action” alternative:

Comments that generally agree with NOI rationale

Some respondents agree with the proposal to select the “No Action” alternative and believe the reasons presented in the NOI for this proposal are accurate and valid. Some of these people are local residents in Idaho and Montana. They thank the Secretary of Interior and FWS for reconsidering the decision because they feel they would have been negatively impacted by grizzly bear reintroduction. Governor Kempthorne writes that the original decision to reintroduce grizzly bears as a “nonessential experimental” population was discretionary.

- “Thank you for reevaluating the decision made earlier and listening to the concerns from those of us that visit the affected wilderness areas of Idaho and Montana.”

- “ I live in Idaho, use the wilderness in my retirement years and have never met a citizen of rural Idaho who supports the reintroduction plan, NONE. The surveys these organizations reference must have been done in strip mall coffee shops near a university in downtown Boise. I support the decision you have made which these groups are asking me to oppose. Therefore, I strongly encourage you to stick to you guns because you are absolutely right.”
- [Governor Kepthorne writes]... “Idaho believes it appropriate initially to place the Secretary's quite justified practical concerns into an overall statutory context because, as the "nonessential" designation indicates, what the FWS determined to do in November 2000 is wholly discretionary. It simply makes no sense to exercise discretion to implement a program that almost certainly will result in loss of life and will serve mainly to undercut grizzly bear recovery efforts in other ecosystems where the bear has an established presence.... Against this statutory backdrop, Idaho turns to the substantive grounds identified in the FWS's June 2001 rulemaking notice as the basis for not proceeding forward with the experimental population. We believe those grounds supply ample cause to rescind a plainly ill advised experiment with not only grizzly bears but also the well being of Idahoans.”

Comments that agree with specific rationale

Some respondents comment on specific rationale, and these are grouped and summarized below.

Inadequate Funding for Bitterroot Recovery

- [Governor Kempthorne writes]... “Until appropriate habitat protections and management protocols are in place to protect the five existing grizzly recovery ecosystems, creating an additional experimental grizzly population in the BE would only add to the likelihood of negative human interactions and sentiment, while draining scarce dollars away from the funding of management of currently established grizzly populations in the Selkirk, North Cascades, Cabinet-Yaak, Yellowstone, and Northern Continental Divide Ecosystems...In light of the questionable human injury and mortality rates presented in the FEIS, Idaho believes that the recommendation to adopt the No Action Alternative is the only common sense solution to avoiding quite plain detriment to human and livestock safety, as well as to existing rural life styles... Idaho concurs with the FWS decision to reconsider the impacts of grizzly bear introduction into the BE in relation to the costs and possible detriment to other currently occupied grizzly recovery areas. The depletion of funds that accompanies the increased management needs of a growing bear population also affects the States within which grizzlies reside. The need for additional funding will become particularly acute after the bear is delisted and the primary responsibility for management and funding is transferred to the States... Idaho thus wholeheartedly concurs with the FWS's statement that "it is neither prudent nor consistent with our recovery priorities to establish a new grizzly population in the (Bitterroot Ecosystem) at this time".... The No Action Alternative

will also promote a more cost effective approach for achieving grizzly expansion into their former range within, inter alia, the Northern Continental Divide and Yellowstone Ecosystems.”

Other Recovery Priorities

- [Governor Kempthorne writes]... “However, it is certain that continued efforts toward establishing the BE experimental population will siphon off funds that might be used for managing the other established bear populations in addition to other recovery commitments for fully protected species. The wisdom of channeling large blocks of FWS time and money, along with the resources of other agencies into establishing a peripheral, experimental population is highly questionable...Three of the five currently occupied grizzly bear recovery populations (Selkirk, North Cascades, and Cabinet-Yaak Ecosystems) have a combined population of only about 100 bears (FWS 1993, Mattson et al. 1995). Conversely, the Yellowstone and Northern Continental divide ecosystem populations, and FWS funding should be focused on the areas of fundamental importance associated with grizzly bear recovery within existing populations. ... Rather than diverting limited FWS resources to reintroducing a nonessential experimental population in the BE, the FWS should continue to focus on ensuring the continued viability of ongoing recovery efforts in ecosystems with existing populations. Efforts directed at the prevention of the loss or decline of any of the existing populations of grizzly bears in the lower 48 states will contribute more towards the preservation and maintenance of genetic materials than would the establishment of a hotly contested nonessential experimental population in the BE. Adopting the No Action Alternative will allow funding that would have been directed towards introductions in the BE to be used to shore up genetics in Yellowstone and the Northern Cascades through augmentation.”
- “Rather than introduce grizzlies into an ecosystem where they are "non-essential," IAC supports focusing on other higher priority recovery activities, as stated by the proposed rules published June 2001, and focusing on projects aimed at maintaining grizzly populations elsewhere.”
- “More and more resources will need to be devoted to the Yellowstone grizzly population. Current issues and populations should be addressed before creating or addressing new ones.”

Human Safety Risks

(See Issue #501 for more information on comments regarding Human Health and Safety.)

- “For many years hikers have traversed the Bitterroot Mountains without fear of bear attacks. These mountains have become a Mecca for recreations whose lives will be in danger with the reintroduction of these bears.”

Agree with All Rationale

- “The ALC also appreciates that USFWS recognizes that "current recovery needs for grizzly bears in other areas," "available resources, as well as the objections of the States that would be affected by the reintroduction of grizzly bears in the BE" limit their ability to adequately conduct this project and limits its success. We also thank USFWS for developing concern and recognizing that "further consideration of the legitimate safety concerns of the current residents of BE against reintroduction is warranted."

LEGALITY OF THE PROPOSED ACTION (104)

Many people believe the proposal to select the “No Action” alternative is illegal. They remind the FWS that it has an affirmative duty under the ESA to recover all listed species and to take only those actions that lead to recovery of the species. For various reasons, they believe the “No Action” alternative will not lead to recovery of the grizzly bears, and thus question the rationale for the decision. They further question the legal grounds for the FWS to make a decision that will not promote grizzly bear recovery. Many believe it is not legal to rescind a ROD which meets the legal requirement to recover grizzly bears under the ESA, and replace it with a new decision that will not promote grizzly recovery, and which contradicts much of the information and conclusions documented in numerous NEPA documents developed for this project. Such a decision is “arbitrary and capricious,” they state. Some comment that it does not matter if the state and local governments are opposed to this plan; it is part of a federal law, the Endangered Species Act.

- “We remind the Service that it has an affirmative duty under the Endangered Species Act to recover all listed species; to base its decisions on the "best available scientific and commercial data"; and to take only those actions which lead to recovery of the species. The Proposed Rule fails to meet each of these tests.”
- [The Nez Perce Tribe]...“As a threshold matter, no reasoning is provided in the Notice of Intent dated June 22, 2001 for withdrawing the Final Rule. Simply stating that FWS “has determined that it is not prudent to recover grizzly bears in the Bitterroot ecosystem” is unsatisfactory. Without further analysis or explanation behind FWS's decision, this action is arbitrary and capricious and otherwise not in accordance with applicable laws”.
- [The Nez Perce Tribe]...“The Tribe Was Not Consulted Prior to Initiation of This Action. The Notice of Intent states: “we strongly believe that the only way to effectively recover grizzly bears is with the help and support of affected states. In order to achieve this, we will continue to work in close cooperation and consultation with states and local governments.” This statement is both factually and legally

inaccurate. First, in addition to consultation with states and local governments, the FWS has an obligation to engage in meaningful government-to-government consultation with affected tribes. As the Tribe was to be a member of the Citizen Management Committee that was created to oversee the recovery operations and because the recovery operation will affect treaty-protected resources within the Tribe's ceded territory, consultation, prior to the issuance of the Notice of Intent fails to recognize the necessity of future consultation with the Tribe during any further discussions regarding grizzly bear recovery. This contradicts the Final Rule's guarantee that grizzly bear recovery will be undertaken "in cooperation with...the Nez Perce Tribe." Final Rule at 8. Should any additional discussion regarding grizzly bear recovery take place, the Tribe must be consulted and be involved in all decision making regarding the future of grizzly bear recovery operations."

- "...the Secretary and all federal agencies have an affirmative duty to restore listed species. The FEIS and the ROD make plain that grizzly recovery is unlikely during the next 50 years without reintroduction. In the 25 years that the Service has been marking grizzly bears, only one bear has moved between ecosystems. Given the high likelihood that any bears that do move such great distances will be males, the likelihood for recovery without reintroduction is low. Moreover, the linkage report makes plain how fragmented the corridors between ecosystems are, which makes it even more unlikely that natural recolonization will occur. In our view, the "no action" alternative is paramount to a "no grizzly recovery" decision, and we believe it is illegal for the Secretary to make such a decision."
- "It is an abandonment of legal obligation under the Endangered Species Act and of the ethical obligation to restore America's Wildlife Heritage for future generations."
- "The Idaho Chapter of the Wildlife Society recommends proceeding with efforts to reestablish the grizzly bear in the Bitterroot ecosystem under the preferred alternative in the FEIS. We believe Secretary Norton's proposal to withdraw this scientifically sound and comprehensive reintroduction plan and select the No Action alternative is both scientifically and legally flawed."
- "It is not possible to achieve full recovery of the grizzly bear in the lower 48 states without several hundred grizzlies in the SBE and protected linkage zones to other ecosystems. This recovery effort is to take place almost entirely on public lands belonging to all Americans. The Interior Dept. has a legal obligation under the law to achieve full recovery and must proceed with this effort."
- "I feel that what the secretary is doing is illegal, and she is not upholding her duty to recover endangered species."
- "Finally, as reported recently in regional media, the Yellowstone population has been completely isolated for 60-70 years, has therefore lost substantial genetic diversity, with continued isolation expected to pose a threat to the species in as little as three

decades. Given the well-documented threats to key Yellowstone food sources, we suspect demographic factors will imperil these isolated bears well before that. For the Service to knowingly take actions which maintain that isolation and worsen this peril is clearly contrary to federal law.”

- “We would remind you that your actions are tantamount to breaking the law, because as Secretary of the Interior, your responsibility as steward of public lands is to enforce the Endangered Species Act which means that you are supposed to save the grizzly bear because it is listed under that law as a species threatened with extinction.”
- “Strictly on a legal analysis, your actions violate your duties under the Endangered Species Act since they are listed under that law as a species threatened with extinction”
- “It does not matter if the state and local governments are opposed to this plan - it is part of a federal law, the Endangered Species Act. They are required to cooperate. This is a matter of preserving a species for the long-term, and that is much more important than some inconvenience to people.”

Many people simply comment that the grizzly bear is a threatened species, and the FWS is mandated by the ESA to recover the species. Most think the FWS should continue to implement the selected alternative and reintroduce grizzly bears to the BE.

- “First I must remind you that your charge and that of the US Fish and Wildlife Service under the Endangered Species Act is by law to ensure the recovery of endangered species, in this case the recovery of the grizzly bear in the lower 48 states.”
- “In refusing to help bears make a comeback in their historic Rocky Mountain habitat, the Service fails in its legal obligation to the public to protect and conserve America's wildlife for generations to come.”
- “Because the grizzly bear is a threatened species we must work to protect its population: it's the law.”
- “Restoring the grizzly bear is MANDATED by the Endangered Species Act under the USFWS -- it must happen.”
- “I strongly urge you not to stop the reintroduction of grizzlies to the Bitterroot-Selway wilderness. You are required under the Endangered Species Act to work to save grizzly bears because they are listed under that law as a species threatened with extinction. Are you not a public servant mandated to follow Federal law? “

- “The government must fulfill its mandate to protect endangered species and to restore native wildlife species to those suitable habitats from which they have been extirpated.”
- “This is a good, balanced plan that has widespread public support. There is an affirmative legal duty to conserve and recover listed species like the grizzly. This duty should be followed rather than shirked.”

Some respondents think the selected alternative (Alternative 1) is illegal. They question the legality of risking human safety by reintroducing grizzly bears, and of establishing a Citizen Management Committee to manage the grizzly bear population.

- “We suggest the introduction of grizzly bears in the Bitterroot Mountains is a criminal act. Over time, a fact of life is some people will be killed/injured by grizzly bears. ...To be 100% safe from grizzly bears, means no grizzly bear restored to the Bitterroot Mountains.”
- “Alternative 1 is more anti-bear and anti-habitat than it is recovery. There is no provision in the ESA for the selection of a citizen management committee as proposed by the ROOTs plan. This misnamed committee is not citizen management but a committee of political appointees. It is illegal.”

A few comments discuss the lawsuit brought by Idaho Governor Kempthorne against the FWS over the ROD to reintroduce grizzly bears to the BE. These people support the lawsuit, and believe grizzly bears should not be reintroduced into the BE.

- “The lawsuit by Idaho Governor Dirk Kempthorne, with full support of Montana Governor Judy Martz should send a clear message to USFW that the citizens of those two states, who share the common border of the Bitterroot/Selway Wilderness, do not want Grizzly reintroduction there. 87% of local people questioned in Ravalli County are opposed to the plan.”
- “... it seems unfair for a federal agency to continue to try and force the issue upon local citizens who have made known thru comments and legal action that they do not want the program, and a program that may also be unfair to the grizzlies who will become problem animals and after a couple of relocations, may have to be shot.”

A number of respondents contrast the legal mandate of the FWS to recover grizzly bears, to what they believe is a politically driven decision to select the “No Action” alternative. Some mention the ESA was enacted on a federal level to insulate decisions concerning threatened and endangered species from local political pressure. They believe the proposal to rescind the ROD based on political pressure from a state governor would set a dangerous precedent for future recovery decisions involving listed species.

- “This should not be subject to the politics of the day. This issue is forever for these ecosystems. Follow the law!”
- “Are we not eroding the very foundations of democracy with actions such as this and the reversal of the roadless initiative?”
- “Restoring grizzly bears to Idaho and Montana is too important to be sacrificed for political reasons. I find it appalling that the decision to abandon the plan that took so much effort to develop, was reached against the wishes of the scientific community and the majority of the public. The decision is indirect conflict with the ESA and puts more importance on pleasing a governor than upholding the law.”
- “The bottom line here is that this country cherishes wildlife and has passed strict laws directing the federal government to take measures to reverse our centuries long assault on our natural environment. ...Follow the law, do your job, and stop acting like lackeys for those who exploit. This is not the role that Fish and Wildlife is supposed to undertake.”
- [Society for Conservation Biology]... “believes that it is inappropriate for the Department of Interior to abandon its responsibility to recover listed species because of opposition from local officials. If the preferences of state officials had been followed, there would have been no restoration of wolves to the BE or GYE in 1995 and no restoration of wild populations of black-footed ferrets. The Endangered Species Act was enacted because Congress recognized the importance of maintaining biodiversity and of restoring declining species. Such goals cannot be accomplished without federal action because the pressure of local interests makes it impossible to address adequately the needs of declining species. Although involvement of local officials in recovery efforts is certainly valid, giving such officials veto power over recovery efforts for federally listed species is not. Such a policy has dangerous implications for all listed and declining species.”
- “The FWS has promised to improve grizzly protection and must live up to that promise regardless of the viciously anti-environment, anti-biotic administration and its hired guns.”
- “To deny the citizens of Idaho and Montana the right to manage the recovery of the grizzly bear is a violation of the basic principles of Democracy and for Gale Norton to ignore the advice of her own departmental experts only displays her own arrogance and incompetence.”

A few people feel that legal action would be warranted if the “No Action” alternative is selected and the ROD and final rule rescinded.

- “It would seem to us that even taking the matter to court would be appropriate, it is that important to the survival of the grizzly bear.”

- “As an Australian I have watched with growing alarm the complete disregard with which such Administration holds the environment both of America and the world. Obviously Interior Secretary Norton has no desire for her grandchildren to enjoy any of the wonders of nature. Should she continue with this plan of action, which must have the President's endorsement (don't forget that - she has not made this decision alone), I believe legal action to be the only morally responsible course of action.”

CLARITY OF THE PROPOSED ACTION (105)

All comments on this issue indicate the Notice of Intent (NOI) and proposed rule to select the “No Action” alternative and rescind all pertinent regulations are confusing and lack sufficient rationale and justification. Respondents are distrustful of the motivations of the Department of Interior and FWS, stating the proposal is not forthright and is contradictory of Secretary Norton's statements of commitment to grizzly bear recovery. Some question why the FWS would select an alternative that encourages natural recovery of grizzly bears in the BE, if the rationale behind this re-evaluation of the decision is to minimize human safety risks as requested by Governor Kempthorne. They point out that the “No Action – Natural Recovery” alternative encourages recovery, and if bears did recolonize they would be protected as “threatened” under the ESA, giving FWS less flexibility to manage the bears to address local concerns and minimize human conflicts. They hypothesize that FWS is actually going to implement Alternative 3, which would mean that grizzly bear recovery would be discouraged.

- “The proposed withdrawals of the reintroduction regulations and Record of Decision fail to provide sufficient justification for abandoning efforts to provide for a higher recovery potential for the grizzly bear and fail to assess the impacts of the No Action Alternative on long-term recovery and maintenance of grizzly bears in the 48 contiguous states.”
- “If the elimination of the grizzly bear from the lower 48 is the intent of the current administration, they should admit this rather than issue lame excuses such as “the need to focus resources within other grizzly recovery areas”.”
- “The citizen management plan is an innovative way to make Federal wildlife laws work for grizzlies while respecting the concerns of local citizens. Secretary Norton's proposal begs the question, why abandon a win-win solution to a very complicated and sensitive issue? There is no rational or logical explanation that has been, or can be, offered.”
- “Please consider Secretary Norton's words, “The grizzlies deserve the best opportunities for their populations to thrive and prosper and I am fully committed to the recovery of grizzly bears in the lower 48 states.” Unfortunately, these words will

ring hollow if the introduction plan is terminated and the No Action Alternative is implemented.”

- “... commenting on the confusing proposal and Notice of Intent (NOI) to no longer support grizzly recovery in the large central Idaho ecosystem known as the greater Salmon-Selway ... We term the new proposal confusing because the NOI expresses a desire to drop alternative 1 for alternative 2, yet all of the administration's public statements and action indicate it really supports alternative 3, no grizzly recovery, which is illegal under current law. This is not a forthright proposal ... The NOI and statement by the Secretary of the Interior justify this change by noting grizzly recovery should be emphasized in areas where populations already exist, not in the largest wild land ecosystem in the lower 48 states. This rings false on two counts. First, grizzlies may inhabit the Big Wild already. ... The NOI refers to the state of Idaho's lawsuit against grizzly recovery as another reason to step back from the reintroduction plan. Yet, the opposition by the State of Idaho is based upon opposition to recovery, not just reintroduction. This distinction is important as natural recovery is emphasized and encouraged under alternative 2 but no reintroduction is planned. Alternative 3 is opposed to recovery. Alternative 2 is supportive of grizzly recovery through measures such as section 7 consultation and requirements for land-use restrictions (FEIS p. 2-45). Alternative 3 would require a change in the law because its purpose "is to prevent grizzly bears from naturally re-establishing in Bitterroot Ecosystem." In other words, alternative 2 does promote some grizzly recovery in the Big Wild, but the action from the administration, as well as the vocal minority of anti-bear people, including Idaho's governor, oppose grizzly recovery in this area. This disconnect does not go unnoticed. ... Again, it is clear the agency and administration intend to deceptively implement alternative 3 by selecting alternative 2. Alternative 2 is somewhat pro-bear, by legal definition, if current policy were correctly implemented. Official agency actions to date have generally been anti-bear, including the previous selection of alternative 1...This confusion of specific terms and of alternatives in the FEIS by the agency has resulted in a strange Orwellian world.”
- [The Nez Perce Tribe]...“The Decision to Select the No Action Alternative Ignores Common Sense. The Preferred Alternative ensures that the recovery area is in the most remote portions of the Bitterroot Ecosystem, far removed from national parks and inhabited areas. Due to the low density of bears being reintroduced, the risk of human-bear or bear-livestock interaction is even further removed. Grizzly bears are primarily vegetarians, and few documented cases of bear-induced human mortality exist. The FWS has projected that, based on 280 bears existing in the Bitterroot by 2115, an estimated one injury will result per year and less than one grizzly bear-induced mortality every few decades. Final Rule at 21. In fact, horses cause greater human injury and mortality per year than grizzly bears. Moreover, grizzly bears may eventually expand into the Bitterroot Ecosystem on their own. Should the bears return to their historic habitat, they will do so under conditions less favorable or

controllable by local citizens or governments than those offered under the Preferred Alternative.”

PROCESS AND PUBLIC INVOLVEMENT (106)

Process and Public Involvement for the NOI to Re-Evaluate the Record of Decision:

Some people comment specifically about the public involvement process for the Federal Register NOI to re-evaluate the ROD and select the No Action alternative. These comments were generally critical of the lack of public involvement in the decision to re-evaluate the ROD. People feel the FWS did not follow their own policies for making significant environmental decisions, and feel disenfranchised in a decision that affects their natural resources. Most respondents comment that there was inadequate public involvement in the latest decision to re-evaluate the ROD and to select the “No Action” alternative.

- “A decision five years in the making, open at many times and in many ways to public participation and comment, and calling for unprecedented local control in management of the reintroduced population, is replaced by one made abruptly and with minimal opportunity for public response and guidance.”
- “One of the most disturbing aspects of the proposed change in the existing Record of Decision is the fact that the decision was made without any federal, state or private scientific input. No scientist knowledgeable about grizzly bears or the grizzly bear recovery plan was consulted before this decision was reached. We believe that this is a breach of the Interior Secretary's responsibility to endangered species recovery.”
- “The "do nothing" policy is very tragic policy made without any attempt to involve the state and federal agencies working to recover grizzly bears in the lower 48 states. You did not pay attention to the support of most Idaho and Montana residents.”
- [The Nez Perce Tribe]... “as a factual matter, the Notice of Intent seems to indicate that the choice of the Preferred Alternative was made without adequate input from local citizens and states. This is simply not true. ...Without question, local citizens had an ample opportunity to comment on the proposed recovery plan. Moreover, the Preferred Alternative assured local input into all recovery decisions through the Citizen Management Committee. Rather than following this approach, the Notice of Intent eschews public comment by adopting an alternative, which is unsupported by science and public sentiment.”

- “I believe Secretary Norton has contradicted her prior statements that decisions about animals and land should include more local participation.”
- “I am greatly dismayed by your proposal to take a position of "no action" concerning the efforts at reintroduction of the grizzlies. Your position is an affront to the work of thousands of informed people who worked in good faith, to create a plan that would be acceptable to all "sides". ... Your proposal throws a chilling shadow over multilateral efforts to reverse environmental degradation all across the nation. The people of the United States overwhelmingly support efforts to save our endangered species and the nations' environmental health. Your action does neither.”
- “We are astounded that a concept that took local citizens several years to build, a proposal that the Fish and Wildlife Service itself advocated at every opportunity for over four years, could be rejected by a new administration after a few weeks of review and no hearings or discussions with local publics and without consultation leading scientists or member of the Interagency Grizzly Bear Committee. Hundreds of people spent hundreds of hours of their time building this proposal, expanding it a public meeting and participating in public hearings. It is a mockery of the NEPA process to think that such a powerful public record can be erased via one notice in the federal register. This decision is transparently arbitrary.”
- “The U.S. Fish and Wildlife Service note in the Missoulian soliciting public comment appeared on August 16 with a deadline date of Aug 21! Not a very wide window.”

A number of respondents comment there was little support for the “No Action” alternative during the NEPA process. They question why an alternative that has historically had minimal public support is now being proposed for selection.

- “There was no public support for the "no action" alternative in public comments on the draft and final EISs. The analysis of public comments on the 1997 draft EIS noted with regard to Alternative 2 (the "no action" alternative), "this alternative received little attention when compared to the others." In comments on the Final EIS in 2000, there were 14,091 comments in favor of Alternative 1 (the preferred alternative adopted last November), but only 29 comments in favor of "no action." No scientific organizations or scientists endorsed the "no action" alternative and only 15 individual citizens did so. For the DOI to reject the overwhelming support for the preferred alternative in favor of an alternative that received almost no support demonstrates a callous disregard for the public process involved in developing a ROD with broad public and scientific support.”
- [The Nez Perce Tribe]... “During the public comment period preceding the Final Rule, approximately 76% of all form letters and petitions received were supportive of grizzly bear recovery in the Bitterroot Summary of Public Comments at Intro 7, 9. However, when it came to differentiating between the proposed alternatives, while

the Preferred Alternative received numerous comments, indicating the level of public input into the decision making process, the No-Action alternative "received little attention when compared to the others...It does not appear that the No Action alternative has received the same considerations as the other alternatives." Id. at 2-1. Thus, not only was the No Action alternative rejected by the ROD, it was also rejected by concerned citizens, who chose to comment instead on alternatives that assured they would have a stake in the management of grizzly recovery."

Some respondents believe the results of the 60-day comment period on the two Federal Register notices will once again show the majority of participants in the process favor reintroduction of grizzly bears in the Bitterroot.

- "I suspect when the 60-day public comment period on Secretary Norton's "no action" proposal ends August 20th, the votes will once again show that the public favors reintroduction of grizzly bears. I think the Citizen Management plan is a ground-breaking way to make federal wildlife law work for grizzlies while respecting the concerns of local citizens. It remains to be seen if Secretary Norton's misguided political philosophy regarding grizzly bears will be allowed to trump the exercise in democracy, generated by this 60-day public comment."
- "Unfortunately for Ms. Norton, the law requires that citizens will have 60 days to tell her what they think of her autocratic rejection of this locally-led plan to return the grizzly to wilderness areas in Idaho. We expect the American people will overwhelmingly support this collaborative approach that creatively and effectively meets the needs of local communities, people and grizzly bears."
- "I urge the Fish and Wildlife Service to reinstate citizen management as the preferred alternative for grizzly recovery in central Idaho and western Montana. ... There is no reason not to do this. Listen to the majority voice. I like to know for once that this current administration is listening to public opinion."

Process and Public Involvement during the NEPA Process for the Bitterroot Project:

Most respondents comment about the quality and results of public involvement during the 6-year NEPA process for the Bitterroot grizzly bear recovery project. The majority state that public involvement during the NEPA process was adequate and most people support grizzly bear reintroduction. Of these respondents, most mention support for the selected Citizen Management alternative. Some respondents, however, believe the public involvement process was inadequate. A few people think local residents were not adequately represented in the public comment process.

Comments that believe the public involvement process was adequate:

Numerous respondents comment that FWS did an adequate and thorough job of involving the public during the 6-year NEPA process. They believe the majority of the public who

participated in the process support reintroduction of grizzly bears in the Bitterroot. They write that there is no reason to ignore the public record on this issue and arbitrarily decide to go against the wishes of the majority of the public.

- “There is strong public support for reintroduction. The public comment on the final environmental impact statement overwhelmingly supported Alternative 1, the Citizen Management alternative. Over 14,000 individual comments were received, including 19 letters from grizzly bear experts and 4 letters from professional wildlife organizations including the Wildlife Society and the International Bear Association. Alternative 2, No Action proposal, received only 29 supporting comments with none from grizzly experts or professional associations. It received the fewest letters of support of the four primary alternatives. Attitude surveys of Montana and Idaho citizens also indicate public support, especially if bears were reintroduced using the concepts of the Citizen Management Alternative. This scientific poll, conducted by Responsive Management, found that slightly less than half of the respondents (46%) supported grizzly reintroduction to the Selway-Bitterroot Wilderness, 35% opposed reintroduction, 9% had no opinion, and 10% did not know. But when explained the primary conditions of the Citizen Management alternative, support for reintroduction increased to 62% while 30% opposed and 8% didn't know. It is important to note that while the State of Idaho has been critic of the Service's grizzly reintroduction proposal, the State of Montana was a supporter of the Citizen Management alternative under Governor Marc Racicot's leadership for several years.”
- “The majority of U.S. citizens surveyed (77%), and local Idaho and Montana citizens (62%), are supportive of grizzly bear reintroduction to the Bitterroot wilderness of Idaho (Duda and Young 1995). A subsequent survey in 1997 (Duda and Young 1998) produced similar results when respondents were asked if they would support reintroduction under Citizen Management: 62% of local Idaho and Montana residents supported reintroduction and 30% were opposed. Further, Service reports indicate approximately 75% of all public comments received throughout the NEPA process have been supportive of grizzly bear reintroduction in the Bitterroots. This strong public support certainly favors the Service moving forward with grizzly bear recovery and reintroduction in the Bitterroot Ecosystem.”
- “The public process and recommendations from wildlife experts should be respected.”
- “The Bush administration has, on many occasions, voiced its concern and support for local involvement in these decisions. Well, in this case there has been broad local involvement, including private citizens, timber and mining interests, local politicians, and landowners. I own remote property in Selkirk Mountains of northern Idaho and I am very much in favor of the reintroduction program.”

Many people believe the results of the lengthy public participation process indicate most people support the selected alternative to reintroduce grizzly bears with citizen

management. These respondents strongly support the reinstatement of the original selected alternative.

- “Public opinion nationwide, regionally, and even locally supports the reintroduction of the grizzly. Local citizens have been involved to an extraordinary degree, and they would run the program. Dr. Terry Anderson, a free-market economist and western property-rights advocate, has praised the Selway-Bitterroot grizzly plan because of its innovative, collaborative approach and consideration of local concerns.”
- “The carefully developed citizen management plan, adopted by the U.S. Fish and Wildlife Service, incorporated concerns and ideas from a broad range of participants. This process is a model for protecting the environment, consistent with the needs of local citizens. It is not fair to derail a successful effort that would have long-term benefits to the nation.”
- “We acknowledge that the support of local citizens is a vitally important consideration in restoration of species like grizzly bears. The decision adopted last November recognized this and proposed a grizzly restoration plan that was unprecedented in the amount of authority and involvement provided to local citizens to manage a restored grizzly population. This innovative plan resulted in significant agreement among people with disparate opinions about grizzly restoration.”
- “The reintroduced plan is supported by the vast majority of people that have commented on it as the record clearly documents.”

A number of respondents believe the majority of local residents in Idaho and Montana support grizzly bear reintroduction. They argue that results of public comment throughout the NEPA process indicate local citizens support recovery of the species in the BE, and only a handful of vocal locals oppose grizzly recovery. Most of these comments support the selected Citizen Management plan, however, a few people support Alternative 4.

- “A related claim that's often heard is the assertion that "locals" were somehow shut out of the process, and their concerns weren't heard. However, of the 2697 individuals/groups that submitted personal, signed opinions, 66% were from the affected states of Idaho or Montana. In addition, 7 public hearings were held around the area immediately affected by the proposal, with virtually all attendees from local and regional populations. The result - 56% favoring some form of reintroduction, while only 3% favored the "No Action" alternative now pushed by Secretary Norton and Governor Kempthorne.”
- “The citizen management program draws strong local support as well as widespread national endorsement, it would be wrong to assume that the governor of Idaho

speaks for the majority of citizens in and around the Selway-Bitterroot area who have voted by a margin of 60+% in favor of recovering grizzlies in the area.”

- “Grizzlies belong in Idaho and are wanted by the majority of Idahoans.”
- “I might point out that during the previous period of public comment on the reintroduction plan majorities of citizens from Idaho and Montana who submitted written comments or spoke at public hearings supported grizzly recovery in the Bitterroots.”
- “To implement the "no action" strategy would ignore the wishes of this Idaho resident and many others in this region provided comments in favor of reintroduction during the original plan development.”
- “The plan was adopted after extensive public comment that revealed support for the reintroduction under citizen management by majorities of Idaho and Montana residents, as well as broad bipartisan and scientific support.”
- “...In fact I have attended a panel presentation where members of the logger's union and of the environmental community sat together to present a unified plan, forced over a seven-year period, that would accommodate grizzly reintroduction and allow a reasonable plan for logging.”
- “The proposed plan has the backing of the local citizens and industries.”
- “...I would hope that you would show that you respect the overwhelming feelings of and the good ideas of sensible and educated citizens. If you do not support the opinions of the citizens of Idaho it will be very hard to have confidence in you to make choices that we support.”
- “As landowners in Lakeside, Montana; we urge the FWS to reinstate citizen management as the preferred alternative for grizzly recovery in central Idaho and western Montana.”
- “I am originally from Polson, Montana and have seen this issue grow and gain overwhelming support from local citizens. I see no reason to stop the reintroduction of this majestic animal to an area where it once called home.”
- “I am a citizen of Idaho and am writing to express my opinions regarding the recent turn of events with regard to the planned reintroduction of grizzly bears to the Greater Salmon-Selway Ecosystem. I agree with the scientific community and the majority of Americans that grizzly bears should be reintroduced to this pristine, wild region and afforded the full protections as outlined in the Endangered Species Act and as described in Alternative Four of the Final Environmental Impact Statement.”

- “I am writing this letter to request that the USFWS reinstate and prioritize efforts to restore grizzly bears in Idaho. As someone who has lived in the West most of my life, was raised on a small family ranch, and who loves the out-of-doors, I have watched over time with interest and hope as a reintroduction agreement among diverse constituents was carefully forged to protect the interests of both the grizzlies and the local community in Idaho.”
- “We could probably survive introduction of the grizzly bear into Central Idaho (as scary as that thought is). We could not survive heavy handed federal government that is obsessed with recovery of the bear to the exclusion of nearly everything else. Our experience here has been that once a species is listed and critical habitat designated for that species, the federal agencies walk around in lock step like zombies muttering, "We must save the species, we must save the species." When that happens local interests are forgotten and the interests of local communities are crushed!”

Comments that believe the public involvement process was inadequate:

Some people believe the majority of public comments received during the NEPA public participation process do not support reintroduction. Many of these people believe that local residents were not adequately represented in the process.

- [Governor Kempthorne writes]... “I also point to portions of the final environmental impact statement ("FEIS") that showed unanimous opposition from Idaho state and local government officials to the nonessential experimental program associated with the reintroduction of grizzly bears into the BE. These officials, and the citizens whom they represent, are the persons most directly affected by the reintroduction program. As State Representative Hornbeck succinctly put it: "You come and you listen to the people of Idaho, the people who live with these bears, and you will find they are all opposed to the reintroduction of the grizzly bear".”
- “In the public meeting in Hamilton in 1997, we believe the deck was stacked so that the media would report that many citizens support reintroduction. If you really want to know the truth, we challenge you to send a survey to EVERY household in the Bitterroot.”
- “As you mentioned the State, local government and individual citizens all have serious concerns and objections to any plan to reintroduce more grizzly bears in Idaho”
- “We believe that during the last 8 years, most citizens of Montana were ignored regarding environmental issues. From logging to fires to roadless areas to reintroduction of grizzly bears, mainstream citizens have not been heard. We believe that you are listening to our government leaders and therefore, us! We need a more balanced approach to these issues.”

One person thinks there should be a vote taken of residents of Ravalli County, Montana.

- “There should be a vote taken of all of the residents of Ravalli County and adjoining counties in an election where people go to the polls for this purpose.”

One person specifically comments about the lack of public involvement in the decision about the recovery area boundaries.

- “The so-called recovery area was chosen administratively and without the requisite public comment.”

Comments Regarding the Entire NEPA Planning Process for the Bitterroot Project:

Some respondents comment on the adequacy of the entire NEPA planning process for the Bitterroot project, rather than specifically commenting on the public participation process. Many of these feel that the planning process was comprehensive and met all of the NEPA regulations, and then question why the final decision of the multi-year planning process may be changed.

Most people believe the planning process was adequate, that the decision to select the preferred alternative was widely supported by the public, and question why the FWS and Secretary Norton would want to change the decision. They comment that such a process is inefficient and will result in a waste of time and taxpayer money.

- “In order for the threatened grizzly bear to be recovered, their numbers and available habitat need to be increased. Years of planning backed by good science have proved the Selway-Bitterroot Grizzly Plan to be a sound management plan for the grizzly bears recovery. The planning for this grizzly bear reintroduction took years and involved all the government and state agencies, and affected citizens and businesses. Never before had the public that was to be most affected by the reintroduction of an endangered species had so much say and influence in the planning and carrying out of the recovery plan. Yet Secretary Norton doesn't seem to care that sound science and the affected public (and the American public as a whole) supported reintroducing grizzly bears to central Idaho.”
- “This plan is a landmark agreement between many disparate interests, and has the majority vote of the citizens of the states involved. I feel it is dead wrong for Gale Norton to step in. ... Sorry, folks, but it shouldn't be up to her. The citizens of Idaho and Montana have voted for this plan, the timber industry, local Indian tribes, and the Fish and Wildlife agency scientists all stand behind it. The people have spoken.”
- “You went through the appropriate public process last time and reached a legitimate outcome. Majorities of people in both Idaho and in Montana, as well as nationwide,

supported reintroduction. To abandon the preferred alternative now would be an insult to all citizens who participated and make a mockery of public involvement.”

- “You have spoken about proper process in environmental decisions. This one has been done as well as it could be done. Local, regional, and national opinion has been strongly in favor of the grizzly reintroduction. Please make it a reality.”
- “The plan is the result of twenty years' work by the Interagency Grizzly Bears Committee.”
- “The EIS process, and indeed the mandate of the USFWS, is to use scientific information and public processes to select the alternative that best meets the stated objective. Many years and dollars were spent doing exactly this.”
- “I thought that the reintroduction of Grizzly bears to the Bitterroot Mountains was a done deal. We went through the process of environment impact statements habitat suitability, access corridors, public comment and scientific expert representatives of every applicable federal, state and tribal wildlife management agency is and has been in full agreement of the plan.”
- “The public involvement system which was developed for the management of grizzly bears in the Bitterroot was a model for the future of endangered species management.”
- “Thousands of dollars have been spent and many public meetings have been held. Now these dollars and meetings seem to be for nothing”
- “I have been a professional in wildlife sciences for 30 years, and know of no other example of such a thorough preparation for a wildlife reintroduction. Not only have the scientific aspects received utmost attention, but, also the proposal has involved private and commercial interests to an unprecedented extent. The concerns of a broad base of citizens have been incorporated in a plan that is both scientifically sound and acceptable to a majority of the public.”
- “This plan has been worked on for more than 5 years. There has been ample time for public comment.”
- “It is odd to me that our government would alter its course of action after it went to the people for public comment.”
- “The very public process has already included comments and input from those opposed to the plan. A late decision now to ignore the overwhelming scientific and public comment favoring reintroduction is not right!”

Many respondents also make the point that the reversal of the well-supported final decision to reintroduce grizzly bears will set a dangerous precedent. They believe it will be harmful to the consensus process that is so important in contentious resource decisions that are becoming commonplace. Such politically motivated decisions will serve to ruin the public trust in federal government actions.

- “My final point is that this reintroduction plan is a great example of cooperation and compromise. Ms. Norton's decision is not only harmful to the recovery of the grizzly bear, but also damages the consensus process. Future contentious environmental issues will only be more polarized. It is basically a bad faith decision, and destroys the trust that many of us have put into the process.”
- “While developing the FEIS the Service listed to the Governor’s and Idaho Fish and Game Commission's concerns. They addressed every concern shy of stopping reintroductions. They changed the Draft and added alternatives, they contracted the best biologists in the nation to conduct habitat quality analyses, they moved boundaries, and they changed the special rule several times to adjust to private concerns, the Attorney General’s concerns, and the Governor’s concerns. They did everything they could and still it was not enough. The Governor just couldn't see past his misperception that grizzly bears are "ill tempered flesh eating carnivores" and was able to change the course of a dozen years of democratic process with the mere threat of a law suit and closed door political maneuvering. Misleading the debate for political gain is a shallow ploy that had never worked with the service previously. I am deeply disappointed in the US Fish and Wildlife Service; where enforcement of the ESA is suppose to be the last hold against politics and for the species in jeopardy.”
- “We participated in the study of the several options for restoring grizzly bears to the Selway-Bitterroot Wilderness Area. We are appalled that the plan finally decided upon might be scuttled. ... How many citizens participated in the 1997 plans review? Is our effort worth nothing? The thinking that went into the final plan was well done, the plan well crafted, and the commitment an understanding valued by all. We considered all the essential factors, including disease control, flora management, safety of livestock, safety of people in the specified areas, and the restoration of a significant part of the American natural scene.”
- “It's important that the Service remember that grizzlies are a nationally listed species, with recovery taking place primarily on public lands belonging to all Americans. Here, it's important to note that of the 24,251 citizens expressing an opinion, over 70% supported reintroduction. As such, it is totally inappropriate (not to mention illegal) to give veto power over the national will or policy to either locals or an area governor. The ESA also contains no exemptions for political pandering to a small, unrepresentative, anti-conservation minority.”

- “We believe that reopening the decision to implement Alternative 1 is clearly an effort to stop reintroduction that trivializes the enormous public process that elicited much time and energy from the public. It serves to make the public believe participation in the NEPA process is meaningless because it can be so arbitrarily overturned. People are being made cynical about the democratic process. This serves the purpose of discouraging meaningful public participation.”
- “...the public comes down squarely on the side of the grizzly and it's reintroduction in the Bitterroots. We've gone through years of the planning process and the local structure is in place to make reintroduction a reality. With the newest edict coming from Washington, however, this entire public process has been ignored. For the public process to be meaningful in any way, we cannot just discard it at the whim of those in charge. For the sake of the future of the grizzly bear as well as the spirit of due public process, continue with the current plan to reintroduce grizzlies to the Bitterroots.”
- “Most feel it is waste of time to write in and express their feelings because we know the letters got to those who are in favor of this foolishness.”
- “The majority of the people support this reintroduction. When will the government support the wishes of its citizens concerning out environment?”
- “The people want Grizzly reintroduction to happen, why are you stalling? The people are the ones that should have a voice in OUR government decision-making but yet the people still feel that BIG business delegates what gets done in Washington. Prove us wrong.”
- “Furthermore, the move to shelve this eight-year process is a blatant mis-use of political power. It also displays callous disregard for the work of dozens of wildlife and forestry experts who helped compile the draft and final EIS documents. Further, the vast majority of public respondents (even in Idaho) have supported the reintroduction effort. How dare the Secretary of the Interior and the USFWS contravene the Endangered Species Act, the scientific community, and the will of the American people?”
- “As someone who has voted Republican, I know that the Republican platform believes localities should have a say in how and whether, certain things are done. Why wouldn't a Secretary of the Interior support a proposal that has such vast support among local citizens, and also fulfills a noble and legally required cause? Opposing this program will give the appearance that you have contempt for the American wilderness, the magnificent grizzlies that live there, and the millions of Americans that hold them both dear.”
- “It is essential that we protect biodiversity of this region, and this key species. It makes me sick to have to make my views known, again and again, and again...”

Some people believe the majority of local residents support grizzly bear reintroduction and recovery. They write that the selection of the “No Action” alternative will ignore the wishes of locals, and will not be responsive to the majority of the public that wants bears recovered in the BE. They question the Bush administration in its rhetoric that it wants to be responsive to state and local interests.

- “Just a few months ago Secretary Norton's Presidential Cabinet Peer, EPA Administrator Christy Todd Whitman, spoke at the NWF Annual meeting about the President Bush's desire to have local stakeholders involved in making decisions on local issues, less government and more people. We do not believe that President Bush's desire is being carried out in this regard.”
- “Furthermore, the move to shelve this eight-year process is a blatant mis-use of political power. It also displays callous disregard for the work of dozens of wildlife and forestry experts who helped compile the draft and final EIS documents. Further, the vast majority of public respondents (even in Idaho) have supported the reintroduction effort. How dare the Secretary of the Interior and the USFWS contravene the Endangered Species Act, the scientific community, and the will of the American people?”
- “In closing, the Bush administration accused the Clinton administration of stomping on the rights of states and local communities. A lot of effort went into grizzly bear reintroduction at the local level with local input. The local input determined a plan to reintroduce the grizzly to Idaho. Now the Bush administration has become guilty of not respecting the rights of those local men and women who have worked so hard towards grizzly reintroduction. I am not surprised by the actions of the Bush administration. An administration that won the presidency by a considerable minority of the vote. Why should this administration listen to the majority now?”
- “Please do not confuse our Governor's opposition to grizzly bear re-introduction with citizen sentiment. The Governor, for unstated reasons, has been adamantly opposed since the plan was announced--perhaps because of the furor surrounding wolf re-introduction in Idaho; more likely because of hunter/outfitter-guide opposition to the plan. But, the plan has had both support from the general public in opinion polls, and from a number of Idaho's major daily papers – the Statesman in Boise, Post-Register in Idaho Falls, the Times-News, Spokesman-Review in Spokane.”

CONSIDERATION OF ALTERNATIVES TO PROPOSED ACTION (107)

Thousands of respondents request reconsideration of the “no-action” proposal as outlined in the federal register of June 22, 2001. The majority of those requesting a

re-consideration, support the previous decision outlined in the Record of Decision. That alternative is referred to as the Citizen Management Alternative (Selected alternative or Alternative 1).

The other alternative that garners a great deal of support and a rally for reconsideration is the previous Alternative 4, Reintroduction of a Threatened Population with Full Protection of the ESA. Supporters of Alternative 4 are adamant about their opposition not only to the “no action” alternative, but to Alternative 1 as well. These respondents do not support the experimental, nonessential designation because bears would be offered less protection under the Endangered Species Act. Supporters of Alternative 4 also disagree with oversight by a Citizen’s Management Committee. They feel oversight should be by a scientific committee.

Several respondents feel the “no-action” proposal is politically motivated. Other comments relating to political influence are found in code 701 of this report. Overall, many people are unhappy with the proposal to change a decision that they had personally invested time and effort into. Several feel betrayed by the turn-around of the previous decision.

- “I am writing to demand that the FWS continue with the plan to reintroduce grizzly bears to the Selway-Bitterroot wilderness area in Idaho and Montana. This plan has been in development for seven years. It entails an innovative, collaborative approach between the government and local residents. After all of the work put into this plan, it should not be abandoned now.”
- “As an agency charged with the recovery of this species, it seems unbelievable that the same agency would withdraw a Record of Decision (ROD) supporting reintroduction/augmentation of grizzlies into an area so important to recovery of the species.”
- “The no action proposal thwarts the will of the majority of people, locally and nationally, who cared enough to comment on reintroduction during last year's FEIS process. The process by which it has usurped last year's record of decision is anti-democratic and unworthy of public support.”

Comments in support of the previously selected Alternative 1: Numerous respondents call for a reinstatement of Alternative 1. The majority of those are for the following reasons: 1) Alternative 1 is a cooperative effort by conservation organizations, agencies and private interests. Many respondents note their personal involvement in this process, cite public opinion polls, restate the support of Governor Racicot of Montana for this alternative, and support by newspaper editorials in the area. 2) Alternative 1 designates grizzly bears as a “nonessential experimental population”, which allows wildlife managers increased flexibility to respond to citizen concerns and to adjust grizzly bear management based on monitoring information. 3) Alternative 1 mandates the

formation of a Citizen Management Committee composed of federal and tribal representatives and appointees from the Governors of Idaho and Montana. 4) Alternative 1 was formulated following studies of the recovery area that ensure adequate habitat exists to ensure grizzly bear survival. 5) Alternative 1 addresses human safety concerns by making allowances for shooting grizzly bears in self-defense or when bears are attacking livestock.

- “The Citizen Management plan is an innovative way to make federal wildlife laws for grizzlies and local people too...The architects of this plan are local workers, business people and conservationists committed to balancing the concerns of local citizens with the requirements of the Endangered Species Act and not "extremists" as you have labeled your environmental critics. The plan was adopted after extensive public comment that revealed support for reintroduction under citizen management by majorities of Idaho and Montana residents, as well as broad bipartisan and scientific support.”
- “Many months and a great deal of effort were spent reaching an agreement regarding the re-introduction of the Grizzly Bear to the Selway Bitterroot wilderness in Montana and Idaho. For the first time, several different interest groups worked on finding common ground with a controversial issue, and have come up with The Citizens Management Plan.”
- “I think that the Fish and Wildlife Service should reinstate citizen management as the preferred alternative for grizzly recovery in central Idaho and Montana. The citizen management plan is a good way to make federal wildlife laws work for grizzlies while respecting the concerns of citizens.”
- “I urge you to please reinstate the "citizen management plan" developed by The National Wildlife Federation and Defenders of Wildlife in collaboration with the timber industry and organized labor groups.”
- “...the citizen management committee offers tremendous opportunities for local residents to voice their concerns about management decisions on federal lands, to shape grizzly recovery strategies, and even to revisit recovery goals in light of new scientific evidence. The Service did an excellent job in outlining the biological justification for the reintroduction in the EIS, the issues and concerns associated with it, and how these concerns would be addressed by establishment of a citizen management committee.”
- “This was the first time a major wildlife recovery plan was developed with full participation of all the local citizens as to how the recovery plan was to be managed.”
- “I strongly support the Citizen Management Plan that was hammered out in months of negotiation between conservationists, the Idaho timber industry and local

labor unions...You and your administration should be embracing the Citizen Management Plan as a model of common sense conservation, and not caving into the scare tactics of those who would derail any attempt to restore America's wildlife population.”

- “The painstaking product of collaboration between the National Wildlife Federation like-minded groups, local labor unions and Idaho's timber industry, the groundbreaking citizen management plan to restore grizzlies won broad bipartisan support, and as a model for making federal wildlife laws work for local communities. Citizen management is a model for making federal wildlife laws work for local people.”
- “The process leading to last year's ROD took 7 years, cost more than \$700,000, was supported by the vast majority of public comments, and was supported by all of the scientific organizations who commented during this period.”
- “This alternative, selected for implementation in the ROD, is one of the best demonstrations of the flexibility of ESA, federal wildlife managers, and an effort to incorporate social and economic needs with the scientific and biological needs of species recovery...It is a shining example of the concept of "local control" that is a high priority of the Bush administration.”
- “As a professional biologist and proponent of grizzly bear recovery, I believe that the biological and Endangered Species Act implications and ramifications of the Natural Recovery alternative are detrimental to species, to the Act and to the Fish and Wildlife Service. Biologically, there is no leg to stand on in the proposal and absolutely no legal or biological change that would make the initial proposal invalid and in need of change. Funding would be available through a joint federal private effort. I recommend that the Service remand the new proposal and reestablish recovery of the grizzly bear in the Bitterroots under the preferred alternative in the FEIS.”
- “On behalf of the 20,000 members of the Alabama Wildlife Federation I am writing to request that the Fish and Wildlife Service reinstate citizen management as the preferred alternative for grizzly recovery in central Idaho and Montana.”
- “The proposal to reintroduce the grizzly bear to this wilderness was done after 7 years of planning among scientists and local citizens and industry. A citizen committee would be in charge of this program and oversee the reintroduction of the grizzly bears. The proposal has the support of former Montana Governor Marc Racicot, the timber industry, mill workers and nearly all of the major newspapers in Idaho and Montana.”
- “The Citizen Management Plan is an innovative way to make federal wildlife laws for grizzlies and local people, too. The administration should

embrace is as a model of common-sense conservation, not caving in to the scare tactics of those who would derail any attempt to restore America's wildlife populations.”

- “The proposed introduction of bears back into their historic range in Idaho and Montana wilderness was an appropriate action based on sound scientific data using a methodology that ensured maximum input in management decisions using a local Citizen Management Committee - how much more local input can be expected”
- “I would like the original plan for reintroducing grizzly bears to the Selway-Bitterroot Wilderness of Idaho and Montana. It was a break-through concept that put local citizens at the helm to make bear recovery work!”
- “The result was the landmark citizen management plan for grizzly recovery in the Bitterroots- the first major wildlife recovery plan to propose giving local citizens a direct voice in managing the recovery effort. The resulting citizen management committee- comprising 12 members nominated by the governors of Idaho and Montana, as well as a member from the Nez Perce tribe, the Fish and Wildlife Service and the US Forest Service would oversee the reintroduction of the grizzly.”
- “Your agency worked and worked for years and actually molded a consensus together on how to manage the grizzly reintroduction. You actually persuaded some ranchers and some timber companies and part of the environmental community and even some public officials to be on the same side for a change.”
- “The citizen management plan is an innovative way to make Federal wildlife laws for grizzlies and local people, too. Far from "extremists" as the president has labeled his environmental critics- the architects of this plan are local workers, business people, and conservationists committed to balancing the concerns of local citizens within the requirements of the ESA.”
- “I say that this plan -- the citizen management alternative -- serves as a bold, new solution to this very issue of citizen involvement, and will have far-reaching effects for conservation in America for generations to come.”
- “Conflicts between people who live in the western U.S. and the eastern U.S. can get in the way of proper wildlife management, since your jobs, ironically enough, come down more to managing people than managing the other animals. That is why a more innovative technique for melding people and grizzlies through a local citizen group is so critical. It removes the east versus west arguments and keeps control in the hands who feel entitled to rule their own fates. If these people are willing to engage in a civil process, why shouldn't we let them.”

- “I am not a resident of one of these states, and I understand the major concerns of citizens regarding the possible encroachment of the bears into human or livestock areas. However, this compromise plan was worked out in detail over a period of years between local, regional and national experts, citizens and lawmakers, and therefore I would believe it has the best possible chance of success.”
- “This plan...enjoys massive public support, evidenced by the past seven years of review, evidence gathering, and public meetings...It gets my personal enthusiasm because the reintroduction is to be run by the PEOPLE who LIVE in the area. That is a great improvement over so many federally operated programs.”
- “If given a chance, the plan would work and the Grizzly Bear recovery will be praised for generations to come.”
- “This is a new day and it calls for new methods, especially those involving broader interests in the issue at hand. Please acknowledge the value of the Citizen Management Team approach by changing the "No Action" decision to the "Full Steam Ahead" with grizzly restoration.”
- “You need to follow through on this final EIS and implement the grizzly recovery plan, regardless of whether or not the current administration likes it.”
- [American Society of Mammologists]... “ We see one additional reason as to why the preferred alternative grizzly bear reintroduction plan is so important. The level of involvement of all interested parties at the local, state, and federal scales built into this reintroduction plan is unprecedented and could serve as a valuable model for implementation of recovery efforts for other large carnivores. We feel that this model deserves to be tested in this case and, if successful, should be applied to other large carnivore recovery plans to ensure more effective and less controversial recovery efforts.”
- “This proposal has been lauded on the editorial pages of virtually every major newspaper in the region. The Idaho Falls Post-Register suggested it "could set a new trend for the next couple of decades in working out environmental problems." The Bozeman Chronicle called it "one of the most forward-looking developments on the threatened species front." The Spokane Spokesman Review termed it "a model for 1990's environmentalism." The Missoulian said "interest groups deserve praise for pursuing a better, more cooperative way of tackling thorny endangered species issues." The Lewiston Tribune editorialized that the proposal "seems so balanced and so fair it makes you wonder what these disparate outfits might have come up with if the jobs saving northern spotted owls and Snake River salmon had been theirs from the start"
- “I believe the cooperation shown by opposing parties in the grizzly bear

restoration issue should be supported. Success is possible when all involved recognize and address the concerns of those with opposing viewpoints.”

- “We are users. That is we horsepack for pleasure in the Bitterroot-Selway and want the return of the grizzlies. It is what wilderness is all about. Citizen management is innovative and respects the concerns of local citizens. Act now to reintroduce grizzlies.”
- “We live in Montana and routinely hike in the Bitterroot mountains. We write with anxious and mixed feelings, as we have enjoyed not worrying about grizzly bears while recreating with our two small children in our beloved wilderness areas. However our concern transcends this mere convenience...We urge the Fish and Wildlife Service to reinstate citizen management as the preferred alternative for grizzly recovery in central Idaho and Montana.”
- [The Nez Perce Tribe]... “ The ROD finds that the Citizen Management Committee under the Preferred Alternative will "allow for flexible" and responsive management" to handle the concerns of local citizens. Id. In contrast, the ROD's discussion of the No Action alternative, provides a bleak picture for the future of bears and the ability of local citizens to manage their recovery...”
- [The Nez Perce Tribe]... “ The Tribe maintains that no new information is available to affect the decision selecting the Preferred Alternative. The Preferred Alternative represents a recovery strategy that properly balances the needs of grizzly bear with the citizens of the United States. Crafted after seven years scientific peer review, public comments, and public meetings, the Preferred Alternative represents sound science and sound policy, recovering the grizzly while granting unprecedented authority to local citizens to manage and oversee the recovery program.”
- [The Nez Perce Tribe]... “ The Citizen Management Committee Ensured Local Involvement. Only the Preferred Alternative adequately balanced the needs of the grizzly with the concerns of local citizens. These concerns were to be addressed through a fifteen member Citizen Management Committee whose mission was to facilitate recovery and make recommendations regarding management strategies. This fifteen member committee would comprise of individuals appointed by the Secretary of the Interior, the governors of Idaho and Montana, and one individual representing the Tribe, representing a diverse cross-section of community interests and viewpoints.”
- [Nez Perce Tribe]... “Moreover, the Citizen Management Committee represented a radical departure from the kind of heavy-handed federal decision making that has caused problems with the ESA in the past. Instead, individuals from all walks of life - ranchers, loggers, environmentalists, and others - worked in the spirit of cooperation and collaboration to develop a plan that would protect the grizzly and

local interests. This innovative, grass-roots plan to save the grizzly bear received significant public support and complemented the science supporting grizzly bear reintroduction. The No Action alternative will not allow for similar local control and will sacrifice the efforts of numerous concerned citizens.”

Comments against Citizen Management: Most of the comments against the “Citizen Management” alternative were either those in support of the “no action” proposal or those in favor of Alternative 4 (see discussion below). Several respondents do not favor Alternative 1 because they want the grizzly bears fully protected under the Endangered Species Act. Many also favor a scientific committee over a citizen committee. Governor Kempthorne of Idaho also does not favor Alternative 1. His primary concern is for the safety of Idaho residents, livestock depredation, and possible brucellosis introduction from the bears taken from the Yellowstone Ecosystem population.

- “...I oppose any action to create a citizens' committee to oversee grizzly bear recovery since such action would take management out biologists' hands, and would give that authority to those who lack the requisite knowledge and expertise to properly manage populations of wild animals.”
- “The citizen's committee appointed by Idaho's governor is a sham. Management of these bears by such a body is a misuse of the ESA. The ESA is in place - USE IT to FULLY PROTECT reinstated grizzlies in Idaho.”
- “I think giving management authority to a citizen's committee is nonsense and folly.”
- “I demand reinstatement of grizzly bears in Idaho under full protection of the Endangered Species Act, as described in Alternative 4 of the Final Environmental Impact Statement. ...It also prevents giving management to a citizens' committee appointed by Idaho's governor who is flatly opposed to grizzly bears. A citizens' committee has no chance at all to work unless the governor supports grizzly bear restoration, therefore the idea of a citizens' committee is not feasible and just does not add up.”
- [Idaho Governor Kempthorne]... “ I also point to portions of the FEIS that showed unanimous opposition from Idaho state and local government officials to the nonessential experimental program associated with the reintroduction...These officials, and the citizens whom they represent, are the persons most directly affected...As State Representative Hornbeck succinctly put it: “You come and you listen to the people of Idaho, the people who live with these bears, and you will find they are all opposed to the reintroduction of the grizzly bear.”
- [Idaho Governor Kempthorne]... “ The secretary is afforded with wide latitude with respect to establishing experimental populations in the hope of facilitating local

acceptance and support...Idaho believes this core purpose of section 10(j) has particular significance here because the November 2000 rule represented precisely the type of agency disregard of local interests and concerns that the statute intended the Secretary to avoid. I stressed those concerns – which included human injury or death, livestock depredation and possibility of brucellosis introduction to the extent bears were taken from the Yellowstone Ecosystem population.”

Comments in support of Alternative 4: The supporters of the previous alternative 4 are unanimous in their belief that the grizzly bears should be fully protected under the Endangered Species Act. Another common response is that the planning, implementation, and management of the recovery project would be guided best by a Scientific Committee, rather than from Citizen Management. There are also a number of supportive comments about the need for linkage zones and habitat restoration to reduce road densities, and a need to restrict resource extraction activities.

- “Grizzly Bears should be put back into Idaho under full protections guaranteed endangered species by the Endangered Species Act (as described in Alternative 4 of the Final Environmental Impact Statement). This alternative maximizes the chances of success in restoring Grizzlies to Idaho by including sufficient habitat and protections for the species. It also prevents giving management authority to a citizens' committee appointed by Idaho's governor, who is flatly opposed to having Grizzly Bears back in the wild of central Idaho.”
- “I am requesting that the Fish and Wildlife Service reinstate grizzly bears in Idaho under the full protection of the Endangered Species Act, as described in Alternative 4 of the ...FEIS. This alternative provides sufficient habitat for the bears maximum chance for survival in the Northwest United States. It also prevents giving management authority to a citizens committee appointed by Idaho Governor Dirk Kempthorne, who is flatly opposed to grizzly bears.”
- “I am writing to implore you to reinstate grizzly bears in Idaho under full protections of the Endangered Species Act, as described in Alternative 4 of the Final Environmental Impact Statement.”
- “Alternative 4 of the Final Environmental Impact Statement is the safest and most sufficient way toward restoration. Giving management authority to a citizens committee appointed by Idaho's governor would be a disaster.”
- “...we also strongly recommend that should the Recovery Plan be revived, that the faults of Alternative One be replaced with the viable concepts of Alternative Four--the Conservation Biology Alternative.”
- “The Service should go to Secretary Norton with an honest, up-front proposal, based on the best scientific data and management. Playing more politics will

just be an invitation for her and the Bush Administration to practice politics as usual, the science and public go to hell. Alternative One was fraught with politics and trashed as a result. Right now, Alternative Four is the only viable option, the only Alternative alive and well.”

- “Restoring grizzly bears to Idaho is too important to be sacrificed for political reasons. 62% of local people and 74% of people nationwide favor grizzly recovery in Idaho. Please reinstate Idaho's grizzlies under full protection of the Endangered Species Act, as described in Alternative 4 of the Final Environmental Impact Statement. It includes sufficient habitat and protections for the bears. It also prevents the Idaho's governor from appointing a committee that opposes grizzly bears.”
- “Alternative 4, as favored by the Alliance for a Wild Rockies, would be best of course, if it is politically possible. Any plan however, is better than no plan.”
- “It is a misuse of power to contravene the Endangered Species Act, the scientific community and public opinion.”
- “Conservation ecology and genetics research suggests that restoring grizzly bears to the Bitterroots is essential for long term population viability of grizzly bears in the lower 48 states by avoiding the loss of genetic diversity and lessening the impact of stochastic environmental events. Grizzly bears should be reinstated in Idaho under full protection of the endangered species act.”
- “I urge you to implement grizzly bear reintroduction in Idaho. I prefer that this be done under Alternative 4 of the Final EIS, as management of these animals should not be put in the hands of a panel appointed by an opponent to the plan.”
- “Furthermore, most of the comments submitted the first time around supported alt. 4, not alt. 1 of the reintroduction proposal, as alt. 4 is the best deal for the bear; science should support what is best for the bear, not what is most convenient for people!”
- “Give the bears the full protection of ESA...no experimental population BS. Do your job for the people!”
- “When they are introduced they should be fully protected by the ESA in exactly the way it is outlined in Alternative 4 of the FEIS. They need all the habitat and protection possible under the law. I do not want a bunch of Idaho governor appointees from the Ag. and Outfitter's Associations running the show in Idaho. The future of the bear is too important to let them derail this reintroduction.”
- “...we wish to register our objection to the way Alternative 4 was characterized in the FEIS, where it states that several laws would have to be amended to

implement this alternative. We feel this is prejudicial language and it is inaccurate. Decisions to log or not log, build roads, close roads, etc. are all subject to existing ESA regulations pursuant to grizzly bear recovery. These decisions do not require amendments to existing federal laws. Alternative 4 seeks agency compliance with these laws.”

- [AWR - TECI - FOC]... “we want to restate our strong support for the alternative 4, the Conservation Biology Alternative. Our earlier comments address this alternative in more detail, discuss its biological advantages, and suggest minor improvements from what was presented in the FEIS. We oppose the proposal to adopt the no action alternative (alternative 2) and the current proposal (alternative 1). The only way the no-action alternative becomes both legal and acceptable is if the agency would follow the law (which it has not, as past experience dictates) take active steps to validate grizzly presence in Idaho, investigate corridors, protect habitat, enlarge the recovery area, and take other actions detailed below.”
- “The NOI refers to the state of Idaho's lawsuit against grizzly recovery as another reason to step back from the reintroduction plan. Yet, the opposition by the State of Idaho is based upon opposition to recovery, not just reintroduction. This distinction is important as natural recovery is emphasized and encouraged under alternative 2 but no reintroduction is planned. Alternative 2 is supportive of grizzly recovery through measures such as section 7 consultation and requirements for land-use restrictions (FEIS p. 2-45). ... Alternative 3 would require a change in the law because its purpose, "is to prevent grizzly bears from naturally re-establishing in Bitterroot Ecosystem" In other words, alternative 2 does promote some grizzly recovery in the Big Wild, but the action from the administration, as well as the vocal minority of anti-bear people, including Idaho's governor, oppose grizzly recovery in this area. This disconnect does not go unnoticed.”
- “The Conservation Biology Alternative...should be adopted as it is the only one based upon sound science...It would recover grizzly bears, provide full protection of bears and their habitat, thereby reducing the chance for mortality. It is a habitat-based approach that is supported by many of the world's leading grizzly bear experts. Alternative 4 maintains full legal protection for all grizzly bears as threatened species under the Endangered Species Act. Alternative 4's recovery area encompasses the entire Big Wild Ecosystem, and protects roadless areas within from logging and road building. Alternative 4 links the Big Wild and the Cabinet Mountains with habitat linkage corridors and also begins an immediate study of potential linkage corridors between the Yellowstone and Glacier/Bob Marshall areas. It is the only alternative, which includes linkage corridors. Alternative 4 restores grizzly habitat by ripping out 3,500 miles of unnecessary roads to restore the habitat linkage corridors. Alternative 4 implements management by a Scientific Committee appointed by the National Academy of Sciences and would include

scientists from the private sector, the US Fish and Wildlife Service, the Nez Perce Tribe, and the state wildlife management agencies in Idaho and Montana. Alternative 4 recognizes that bears may already be in the area and should receive full protection. This latter point is important as cooperative efforts are underway to document grizzlies in the region.”

- “The Conservation Biology Alternative, alternative 4, is the best one, perhaps the only one, to meet the requirements of the ESA. More individuals who commented and supported a specific proposal supported this one than any other alternative. It has the support of the country's best grizzly experts.”

Comments pointing to political influence in the process and a need to reconsider the “no-action proposal: Most of the comments relating to undue political influence are directed to President Bush and Secretary of the Interior, Gale Norton. Some comments are directed to the FWS and request that the agency disregard political influence and forge ahead with the previous decision. Other comments pertaining to “political influence” are in code 701 of this report.

- “This is common-sense conservation in action, Mr. President. This is also your administration's opportunity to deliver on its own promises about getting local voices involved in environmental decision making and collaboration with the federal government. Killing this Plan now because of false fears and the whim of one single governor (Kempthorn - Idaho) could also kill America's confidence that conservation progress can happen under your administration.”
- “I hope you can see through the politically based decision reversal coming out of Washington and will adopt Alternative 4 under the Impact Study.”
- “...go forward...as previously planned...The only ones against this seem to be the politicians - obviously not a good reason to cancel this important project.”
- “I feel that the Secretary of the Interior and the Governor of Idaho are trampling on my rights. This plan was adopted after much public involvement and Secretary Norton is overstepping her position. This is after all, supposed to be a government by the people...not just a few influential people. The citizen management plan can work if politicians aren't allowed to derail it with the political games.”
- “The Fish and Wildlife Service should reinstate the citizen management for grizzly recovery here in the west, not the beltway on the east coast.”
- “I find it hard to understand why Secretary Norton would want to undo all the hard work that has been put into the plan to introduce grizzly bears back into the Selway-Bitterroot Wilderness area.”

- “As a member of Republicans for Environmental Protection, I urge the Fish and Wildlife Service to reinstate the Citizen Management program for grizzly bear recovery in Idaho and Montana.”
- “Much planning has already gone into the design of the reintroduction project. It should not be abandoned for superficial, short-term political reasons...I urge every effort to go ahead with the reintroduction.”
- “Let the folks of Montana and Idaho manage grizzly bears, not bureaucrats and political appointees from Washington D.C. Let us move forward with the restoration of these great monarchs to the wilderness of Idaho and Montana.”
- “I am opposed to Secretary Norton's proposal to adopt an official position of no action. This citizen management plan was a win-win-win. Why change it?”
- “After much discussion concerned and involved citizens of Idaho and Montana made a recommendation as to managing grizzlies in the Bitterroots. Now Gov. Kempthorne wants to upset the apple cart, so to speak. Stay with the preferred alternative.”
- “I feel it is dead wrong for Gale Norton to step in...Sorry, folks, but it shouldn't be up to her. The citizens of Idaho and Montana have voted for this plan, the timber industry, local Indian tribes, and the Fish and Wildlife agency scientists all stand behind it. The people have spoken.”
- “I am also appalled that Ms. Norton would so blatantly ignore the wishes of the many concerned and active participants of the Citizen Management Plan. To do so is not only not good management; it is insulting to many thoughtful and concerned people.”
- “The proposal to restore grizzly bears in Idaho and Montana meets the requirements of local control and broad-based support that makes it ideal for Republican-backed conservation measure. Please bring it to reality in the Bush administration.”
- “I thought that the Republican party platform was to minimize big government. Well, overturning citizen management committee conclusions is about as close to being an interfering government as I can imagine.”
- “Interior Secretary Norton's proposal to rescind plans to reintroduce threatened grizzly bears to the Selway-Bitterroot Wilderness is ill conceived and demonstrates that she has no intention of upholding her confirmation hearing promise to fully implement the Endangered Species Act.”

- “Since it is becoming ever more clear that Secretary Norton does not in fact support any conservation efforts; she should not stand in the way of coalitions of citizens and affected industries who have joined together to come up with a conservation plan everyone can live with. I urge Secretary Norton to let the citizen's will prevail.”
- “As a citizen and ardent supporter of President Bush. I believe that the citizen management plan is a good one, that it has merit, and that it will work. I urge you to support it as model of innovation during your tenure and as an offering of compromise to the liberals of our country, and as a feather in the hat of President Bush.”

NEPA PROCESS (108)

Many respondents think the FWS had followed and met all of the necessary requirements under the National Environmental Policy Act (NEPA) and the ESA. They write that the Environmental Impact Statements and Record of Decision (ROD) are comprehensive, and the selected alternative is a remarkable plan, based on the best available science and the best choice. Many note the cost of the lengthy NEPA process and the public support for grizzly bear recovery evident throughout the process – and question the rationale for the new proposal to select the “No Action” alternative.

- “Objections to the reintroduction and allegations that the Service did not follow appropriate procedures under ESA and NEPA should be left to the federal courts to determine. A decision to reverse the decision to reintroduce bears should only come as a result of litigation and a subsequent court order to do so, not as a result of a change in administration!”
- “The Service also listened to and incorporated the Idaho Governor's and Idaho Fish and Game Commission's concerns into the FEIS and ROD. They addressed every concern short of stopping the reintroduction plan. The Draft EIS added alternatives 2, additional habitat quality analyses were conducted (Hogg, Weaver, and Craighead 1999; Boyce and Waller 2000), and the recovery and analysis area boundaries were changed, as well as the special rule to address private citizen's, the Attorney General's, and the Governor's concerns.”
- “Much site specific planning and effective (NEPA required) public involvement have taken place in preparation for recovery efforts to go forward in the Bitterroot area.”
- “I strongly urge you not to stop the reintroduction of grizzlies to the Bitterroot-Selway wilderness. Not only are we required under the Endangered Species Act

(1973) to work to save grizzly bears from extinction, the process has undergone every bureaucratic stepping stone, only to be stopped by one person, yourself.”

- “This recovery plan is based on sound science, management, public involvement, and compromise, was the preferred alternative of the very agency responsible for the recovery of endangered and threatened species, and is the plan that has been supported by the American Society of Mammalogists and many other scientific societies, as well as by individual conservation and wildlife biologists, including bear biologists working on this project. The grizzly bear recovery plan was the product of over seven years of hard work, public involvement, and compromise in the process and had acceptance from virtually all interested parties. All told, this is a truly remarkable reintroduction plan.”

Some comments question the adequacy of the NEPA process. They think the DEIS and FEIS are narrow in scope and does not consider enough alternatives. Some complain their comments on the DEIS were not considered by the FWS in the FEIS. Others are critical of the accuracy of data analysis in the FEIS.

- “The USFWS has much more flexibility under the ESA than was exhibited in the DEIS or FEIS. Failure to examine this flexibility through the NEPA process violates the intent of NEPA and the ESA as well.”
- “We incorporate in full by reference our comments on the DEIS and the separate Proposed Special Rule under Section 10(j) of the Endangered Species Act, comments dated November 26, 1997...We note that in our view the deficiencies noted therein have not been satisfactorily remedied in the FEIS.”
- “...the DEIS and the FEIS have failed to inform the public of another reasonable alternative under section 10(j) of the ESA, which is "experimental, essential" status. The failure to notify the public of this provision of the Act shows a pre-decisional bias towards the "experimental, non-essential" designation. The FEIS fails to inform of the "experimental, essential" status, which is more consistent with the descriptions of purpose and need and the scientific data outlined above. The failure to discuss or include the "experimental, essential" status as a reasonable alternative offered for public comment is a clear violation of the National Environmental Policy Act.”

Idaho Governor Kempthorne writes the FEIS does not adequately analyze the impacts to human safety and negative impacts to grizzly recovery and genetics from implementation of the selected alternative. These issues will be addressed in further detail under Issues 402 and 501 in this document.

- “...The impacts of grizzly bears on human safety and security were not adequately evaluated in the FEIS. The subject of grizzly bear/human interactions is a critical issue that must be carefully weighed before any decision on reintroduction is made.

...Importantly, with respect to the proposed BE experimental population, the FEIS did not provide a thorough evaluation of the detrimental impact to grizzly recovery and genetics which could result from establishing the nonessential experimental population.”

Many people question if it is valid under NEPA to select the “No Action” alternative and rescind the ROD and final rule. They state this is the first time in history the FWS has attempted to withdraw a ROD. They believe the decision is arbitrary and a mockery of the exhaustive NEPA process that has lasted years actively engaged the public and cost thousands of taxpayer dollars.

- “...we note with interest that Secretary Norton's withdrawal of the existing grizzly bear reintroduction preferred alternative in favor of a "no action" alternative is the very first time in the history of the USFWS or the ESA that an existing Record of Decision has ever been withdrawn. Are we to assume that this action sort is typical of the intentions of the current administration toward endangered and threatened species and their recovery?”
- “We are astounded that a concept that took local citizens several years to build, a proposal that the Fish and Wildlife Service itself advocated at every opportunity for over four years, could be rejected by a new administration after a few weeks of review and no hearings or discussions with local publics and without consultation leading scientists or member of the Interagency Grizzly Bear Committee. Hundreds of people spent hundreds of hours of their time building this proposal, expanding it a public meeting and participating in public hearings. It is a mockery of the NEPA process to think that such a powerful public record can be erased via one notice in the federal register. This decision is transparently arbitrary.”
- “The Service certainly did not need to complete a multi-million dollar planning process and NEPA review to reach a determination that the agency has higher recovery priorities and a lack of funds to implement the reintroduction. These conclusions could have been reached without embarking on an extensive and expensive planning process.”

The Nez Perce Tribe and others write that the “No Action” alternative is not supported by the ROD and was not supported by the public during the NEPA process. They question the NOI rationale for re-evaluating the ROD and proposing to select the “No Action” alternative.

- [The Nez Perce Tribe]... “The Decision to Select the No Action Alternative is Not Supported by the ROD. The ROD's discussion of the No Action alternative, provides a bleak picture for the future of bears and the ability of local citizens to manage their recovery. In particular, the ROD states that selection of this alternative would "likely result in no recovery of grizzly bears" and "would result in the less management flexibility for the Service to resolve local concerns." Id. at 6. As such,

the FWS decision to abandon the Preferred Alternative in favor of the No Action alternative stands in direct contradiction to the agency's own ROD. Further, the ROD quite clearly discredits FWS's statement in the Notice of Intent regarding their desire to withdraw the rule to allow for local concerns to be better taken into account.”

- “There was no public support for the "no action" alternative in public comments on the draft and final EIS. The analysis of public comments on the 1997 draft EIS noted with regard to Alternative 2 (the "no action" alternative), "this alternative received little attention when compared to the others." In comments on the Final EIS in 2000, there were 14,091 comments in favor of Alternative 1 (the preferred alternative adopted last November), but only 29 comments in favor of "no action." No scientific organizations or scientists endorsed the "no action" alternative and only 15 individual citizens did so. For the DOI to reject the overwhelming support for the preferred alternative in favor of an alternative that received almost no support demonstrates a callous disregard for the public process involved in developing a ROD with broad public and scientific support.”

SUGGESTIONS FOR A DIFFERENT COURSE OF ACTION (109)

Numerous comments do not support the proposal to select the “No Action” alternative and a few offer suggestions for different courses of action. Most people write that they support the selected alternative to reintroduce grizzly bears as a nonessential experimental population under citizen management, and urged the FWS to continue implementing it. Some comments urge the selection of FEIS Alternative 4, to reintroduce and recover grizzly bears in the BE under ESA “threatened” status. These comments supporting other FEIS alternatives are summarized under Issue #107, “Alternatives to the Proposed Action.”

Some people suggest new courses of action, which differ from the current proposal to select the “No Action” alternative, and also from selection of other FEIS alternatives. These suggestions range from delaying implementation of the original rule until funding is available, to working with private organizations to raise funds, to developing a new plan for recovery of grizzlies, to dropping recovery programs in the BE until local citizens become more tolerant.

Suggestions to delay implementation of the current recovery program until funding is available include:

- “If the present Record of Decision cannot be implemented because of funding appropriations and budgetary constraints, it should remain as an Endangered Species Act finding that awaits adequate funding. Similar decisions, contingent upon adequate funding and prioritization, occur with other listed species.”

- “If current budget constraints will not allow for reintroduction to occur as originally scheduled, delayed implementation of the original rule would be a far superior alternative to "No Action".“
- “The decision the Service is about to make should not throw away the millions of taxpayers dollars already invested in the planning and NEPA processes. NGO's and the public may in fact find avenues to raise funds for the reintroduction (or a potential change in administration in 2004 may be sympathetic to grizzly recovery in the Bitterroots).”
- “At our 81st Annual Meeting held from 16-20 June 2001 at the University of Montana, Missoula Montana, the American Society of Mammalogists unanimously passed a resolution (enclosed) on grizzly bear recovery calling on the secretary of the Interior to reconsider all of the careful, ground-breaking efforts and compromise that have gone into the Selway-Bitterroot Ecosystem Grizzly Bear recovery plan and initiate the reintroduction into this wilderness area of Montana and Idaho to move forward as an integral step towards recovery of this species as mandated in the Endangered Species Act. The ASM also called on Congress to fund fully grizzly bear recovery in the lower 48 contiguous states, including the Selway-Bitterroot ecosystem.”
- “Based on the above considerations, I believe it is premature and dangerous to introduce grizzlies to the proposed regions of the lower 48 states at this time. Minimally, the reintroduction should be delayed until adjustments in our waterways policies allow natural wild salmon populations to move freely from the Pacific Ocean to and from their spawning beds in streams of the western slope. In any case, wild salmon will have a much larger beneficial impact on the environment and humanity than a top-of-the-food-chain predator.”

Suggestions to develop a new revised recovery plan include:

- “With only 800 to 1,000 grizzlies remaining, I strongly support a revised plan based on conservation biology that would revolve around a scientific steering committee.”
- “The Service should go to Secretary Norton with an honest, up-front proposal, based on the best scientific data and management. Playing more politics will just be an invitation for her and the Bush Administration to practice politics as usual, the science and public go to hell. Alternative One was fraught with politics and trashed as a result. Right now, Alternative Four is the only viable option, the only Alternative alive and well.”
- “Coming from someone who is incredibly fearful of the grizzly, I am more concerned with the loss of the Grizzly Bear's ability to exist in its known natural habitat. For the reason being that humans have pushed the grizzly out to make way

for themselves does not make it right. Coexistence is the KEY, NOT the PROBLEM. It is our DUTY to find a common ground and not take the easy way out and veto the Grizzlies chance to live here. I ask that someone take the action needed before it's too late. I ask that someone CREATE an OPTION that too few small minds either refuse or are simply incapable of creating.”

- “I have read that a major concern of your office is that there is not enough genetic diversity in the existing populations of Grizzly Bears, such as in the Yellowstone or Glacier or Yaak areas. I, too, am concerned about that and think money could be more wisely spent for the good of the bears by capturing a few breeding age bears from each of the healthy populations and transplanting them among the other populations. This would diversify the gene pool, without costing millions of dollars that would have been spent on reintroduction, education, and future management of Grizzlies in the Bitterroot.”
- “Recently you halted the reintroduction of grizzly bears into the Bitterroot-Selway wilderness. Given that you are required under the Endangered Species Act to work to save grizzly bears, I am assuming that you have a more proactive strategy in mind. I am assuming that your goal is to actively work with other state and federal agencies to create linkages between Yellowstone, Glacier, Bob Marshall, the Bitterroots, Frank Church and beyond to insure that grizzlies naturally colonize all large road less areas in order to insure the viability of this species over the long term. Since the plan to restore grizzlies was so carefully and conscientiously designed by such a diverse group of Montana and Idaho citizens, this is the only explanation that I can conceive of to explain your actions. Any other action would seem to be illegal given that you are entrusted with enforcing the Endangered Species Act.”

Suggestions to drop plans to recover grizzly bears in the BE include:

- “Dropping the program for now may make Idahoans more likely to tolerate it at a later date when more studies are complete.”
- “I live within three miles of the Selway-Bitterroot Wilderness, and I can assure you that I do not support reintroduction of grizzly bears to my neighborhood. Maybe you can see to it that they can be sent instead, to the neighborhoods of the NWF, and the Sierra Club members.”

BEST AVAILABLE SCIENCE (110)

Requirements to Use the Best Available Science

Many people comment that the FWS is required under the Endangered Species Act to use the best available science in their decision-making process. They believe sound science

should guide decisions on recovery and management of endangered species, and politics should not replace science and dominate the decision-making process. Most comments indicate the original decision to reintroduce grizzly bears to the Bitterroot was supported by the best available science, and further assert that the proposal to select the “No Action” alternative is without scientific merit.

- “As a 4th grade teacher, I hope to be able to assure my students that government organizations like the USFWS is making decisions based on sound ecological research and scientific literacy.”
- “I feel it is your job as resource managers to rise above the politics of the situation, use sound scientific research and make recommendations and manage for the best possible grizzly bear protections - and that includes restoration of grizzlies in Idaho.”
- “We have been outraged at Norton's decision to turn her back on all the work and positive energy that went into developing this plan...An enormous body of scientific research supports the logic of this restoration effort. The fact that Norton never bothered to consult with the Interagency Grizzly Bear Committee or other scientists about this issue makes a mockery of the decision-making process she followed, as well as the decision she reached.”
- “Reintroduction of any species should be based on scientific data and not the whims of a Secretary of Interior who is controlled by timber, cattle, oil and mining interest.”
- “If the administration wants to make science-based decisions and do right by the public, by carrying out its wishes, it will go ahead with the reintroduction.”
- “Please return to decisions being made based upon science and the desires to have healthy ecosystems, which include historic wildlife populations.”
- “Let's stick to a good decision based on science and cooperation, not emotions and politics.”
- “The Fish and Wildlife Service along with state Game and Fish personnel are the experts in this field. The decisions of these experts should be final and looked upon with value.”
- “I am in favor of science-based decision-making, and feel that the reintroduction efforts are based on sound science.”
- “It is a misuse of discretion to ignore the Endangered Species Act and clear scientific evidence of the impact that failure to introduce grizzly bears into Idaho will have on the Yellowstone grizzly.”

- “Interior Secretary Gail Norton is wrong to oppose reintroduction by adopting a "no action" alternative, as this does not follow the spirit of the Endangered Species Act by using the best science in an effort to further recovery efforts and bridge together isolated populations of slow-reproducing "keystone" or "indicator" species such as the Grizzly Bear.”
- “To ignore the advice of scientific experts and seven years of hard work by timber and environmental officials is untenable.”

Best Available Science Regarding Recovery of Grizzly Bears in the Bitterroot Ecosystem:

Numerous respondents believe the best available science indicates grizzly bears need to be recovered in the BE to ensure the recovery of the species in the lower 48 states. Most also state that reintroduction will be required to recover grizzly bears in the BE. They are frustrated by their perception that the proposal to select the “No Action” alternative ignores the scientific effort and taxpayer money that has been expended over the past decade; the results indicating grizzly bears need to be reintroduced to the BE. Most of these comments are supportive of the selected alternative to reintroduce grizzly bears as a nonessential experimental population with citizen management.

- “I am a former resident of Missoula, Montana and I am very familiar with the Central Idaho Mountain wilderness. I am opposed to the Fish and Wildlife Service's decision not to reintroduce the grizzly bear to the wilderness of Central Idaho and Western Montana. All of the science points to reintroduction in the Bitterroots as being the correct action at this time. It is critical to ensure the long-term survivability of the grizzly bear in the lower 48 states.”
- “This area is the best location for such action and it should be initiated as proposed by the many knowledgeable biologists and wildlife experts as well as the majority of the public who own these federal lands.”
- “We believe the selection of the preferred alternative was based on sound science and there are no legitimate reasons for changing the preferred alternative.”
- “Your own scientific studies have shown that this region has enough suitable habitat to support the grizzly and is an important connector to critical habitat in Canada.”
- “The proposed introduction of bears back into their historic range in Idaho and Montana wilderness was an appropriate action based on sound scientific data using a methodology that ensured maximum input in management decisions using a local Citizen Management Committee - how much more local input can be expected?”
- “Scientists see this project as critical to the long-term survival of grizzlies in the American West.”

- “Finally, why are we having to go through this process all over again? The Endangered Species Act is clear and unambiguous. The scientific community has spoken, and the people of America have spoken. The grizzly bear belongs in north-central Idaho, as it does in many other ecosystems. It's time to right an ecological wrong done, in ignorance, by our forebears. It's time to return the grizzly bear to north-central Idaho!”
- “...science supports the bear's recovery...”
- “Scientists say this important project already approved by the US Fish and Wildlife Service after seven years of planning holds the key to the long term survival of grizzlies in the lower 48 states.”
- “The proposed restoration is a sound measure backed by solid scientific research, with careful attention to safety, location, and cost efficiency.”
- “The reintroduction plan is supported by sound science and good policy.”
- “We have already spent countless hours and dollars to arrive at the correct scientific decision to restore grizzlies to Idaho.”
- “Years of study by expert scientists, led by Chris Servheen, an authority in the field of Grizzly Bear Recovery may have been wasted when the Interior Secretary, Gale Norton took a "no action" position.”
- “It is also clear that the "best available scientific information" weighed in strongly in support of the original Preferred Alternative. The original preferred alternative was endorsed by all of the professional wildlife societies who commented during the EIS process and was supported by the Interagency Grizzly Bear Committee.”
- “This also ignores the work performed by the scientific community, which taxpayers have rightly spent many thousands of dollars, to determine the best action to restore grizzlies into their former range.”

Some people, however, question the scientific conclusions that indicate grizzly bears need to be recovered in the BE. They support the proposal to select the “No Action” alternative because they believe the best science does not indicate grizzly bears need to be reintroduced or recovered in the BE.

- “Why would we want to take deliberate actions to endanger bears when there is a healthy population in other parts of the country? I sincerely hope that the decision to reintroduce the grizzlies will be reversed. It is my belief that the original decision was based on romantic notions and bad science.”

- “And the notion that the proposed introduction area is or was good grizzly bear habitat is not supported by the scientific evidence provided. This boondoggle must be stopped somehow.”
- “Any other action except the no action alternative would be premature on the part of the FWS. As the respondents argued in great depth in their Comments on the FEIS...no structured and controlled scientific investigation has been completed to determine whether grizzly bears do actually inhabit the BE presently, either permanently, or in route to other areas. The official position taken by the Service that No Bears exist within the BE is not based on current, credible, or substantial scientific investigation. The nature of the limited data that does exist regarding grizzly bear presence in the BE from other federal agencies such as the United States Forest Service and the game management agencies of the State of Idaho and the State of Montana indicate a small but persistent grizzly bear population over time in and near the BE. This data consists of reports of chance sightings or encounters with bears, and is not the result of structured scientific investigation, capture, and preservation of physical proof such as DNA samples or plaster casts to document the presence of bears.”
- “I was a line and staff officer dealing with the ESA for over 25 years until I retired from the Forest Service. I'm opposed to grizzly reintroduction anywhere until the USFWS becomes reasonable and cooperative instead of feeding the public their pseudo science.”

Some comments discuss specific scientific information relevant to grizzly bear recovery in the BE.

- “Habitat fragmentation may result in smaller and more isolated wildlife populations, particularly for species such as Grizzly bears with demanding habitat needs. Smaller populations are more vulnerable to local extinction, due to stochastic events. (Shaffer 1978, Gilpin and Soule 1986). Smaller populations are also more susceptible to the negative effects of inbreeding depression. hence, maintaining landscape connectivity is essential to allowing for the replenishing of populations and expansion of gene pool (Noss 1983, 1987, 1992, Noss and Harris 1986, Craighead *et al* 1997, Craighead and Vyse 1995, Paetkau *et al* 1997, Beir 1993).”
- “The best available science tells us that large, connected areas of habitat are crucial to the survival of a major predator like *Ursus arctos horribilis*.”
- “The best science indicates this area has great habitat, perhaps the best habitat, of any area in the lower 48 for grizzly recovery (including Yellowstone and the Northern Continental Divide Ecosystems, see the final vegetation analysis for the Bitterroot area done by the Craighead Institute, 2001...Certainly, the public supports grizzly recovery in the area, as both polls and the public comments on this issue prove.”

Best Available Science With Respect to the Proposal to Select the “No Action” Alternative

Numerous respondents believe the best available science does not support the reevaluation of the decision to reintroduce grizzly bears to the Bitterroot, and the proposal to select the “No Action” alternative. They question the rationale and motivation of Secretary of Interior Norton in proposing to implement the “No Action” alternative. Many speculate this proposal is politically rather than scientifically motivated. Comments question whether scientific input was sought in the decision-making process.

- “Does it strike anyone else as totally absurd that Secretary Norton's "no action" proposal is entirely political and entirely non-scientific? Her theory that island populations in Yellowstone and Glacier can be increased to complete the recovery process is pure hogwash. Apparently she did not even bother to consult with the IGBC or even one scientist knowledgeable about grizzly bears.”
- “The fact that Secretary Norton's decision to withdraw the existing ROD without participation by the Service's Grizzly Bear Recovery Coordinator, the Interagency Grizzly Bear Committee, or other scientists knowledgeable about grizzly bears and the grizzly bear recovery plan points to a politically motivated decision rather than one based upon scientific reevaluation of the decision and the best interests of grizzly bear recovery.”
- “It is curious to note that when the new proposal was being considered, none of the initial authors of neither the FEIS nor the grizzly recovery coordinator, nor any biologist with prior involvement was asked for input. As a matter of fact a "gag" order was placed on all Service biologists regarding this topic. The Secretary clearly implies that this is a political maneuver. Failure to base a decision of this magnitude on any type of science, good or bad, relieves the Secretary and the new Administration of any credibility in this issue and strains the positive perception the public has of Service biologists.”
- “Gale Norton's suggestion that we cancel the reintroduction is not based on science but purely politics. To turn against a community consensus goes against the idea of collaborative efforts and is an insult to the Endangered Species Act.”
- “The consensus of scientific opinion favoring this introduction should not have been disregarded by Interior Secretary Norton.”
- “Restoring grizzly bears to Idaho and Montana is too important to be sacrificed for political reasons. I find it appalling that the decision to abandon the plan that took so much effort to develop was reached against the wishes of the scientific community and the majority of the public. The decision is in direct conflict with the Endangered

Species Act and puts more importance on pleasing a governor than upholding the law.”

- “The apparent decision by Secretary Norton to curtail the recovery effort for grizzly bear in Idaho carries scientific, legal and political mistakes and ramifications. It is the age-old U.S. Government strategy to make promises and then break them. The public is very weary of being lied to.”
- “Secretary of Interior Norton is dead wrong when she states she should focus on recovery in other areas...This is the heavy hand of bureaucrats trying to undo the hard work of conservationists, scientists, and local businesses and people. It is choosing politics over science and democracy!”
- “It is my understanding that leading scientists have stated that grizzlies should be re-introduced in this area. Please listen to the scientist community and local officials who have worked on this plan rather than politicians.”
- “I am opposed to Interior Secretary Norton's proposal, which seems to be politically inspired it certainly is not good science.”
- “We find Secretary Norton's action to be politically motivated and in direct contradiction of her promises to conduct Interior policy according to the "best available science." In fact, scientists say this project holds the key to the long-term survival of grizzlies in the lower 48 states.”
- “Rather than increasing its efforts to recover grizzly bears in other areas, the Bush administration is working as hard as it can to weaken grizzly protections everywhere possible. It is hard to imagine a more heavy-laden exercise of politics over both science and democracy and it is up to all of us who care about the "Great Grizzly" to say this is not acceptable.”
- “The administration is misusing its authority when it bases critical environmental decisions such as this on presidential whim or cronyism rather than responding to the scientific community, the Endangered Species Act and the public.”
- “Secretary Norton dismisses the uniqueness of the plan based primarily on fear, as opposed to good science.”

A few people agree with the proposal to select the “No Action” alternative and assert that science should not enter into the decision process. They believe political opinion versus scientific research should dictate decisions under the Endangered Species Act.

- “We are in accord with Secretary Gale Norton's ideas on the grizzlies in addition to her other views on the wilderness and environmental issues. We hope that she will prevail and not give in to the scientists.”

- “I strongly agree with Interior Secretary Norton's decision to not reintroduce grizzly bears into the Selway-Bitterroot Wilderness. Scientific opinion advocating reintroduction is irrelevant. Scientific opinion does not trump common, collective, political opinion in our system - much to the chagrin of intellectual elitists. The decision whether to reintroduce the bears is purely political. The Endangered Species Act (ESA) was not divinely mandated. It is merely the political fulcrum for proponents without which no one would have to ask for scientific opinion.”

A number of people say the best available science does not support the proposal to select the “No Action” alternative. They point out that the Federal Register Notice of Intent and Proposed Rule do not present any scientific information to support the proposals to select the “No Action” alternative and rescind all pertinent regulations from the Final Rule of November 2000.

- “Secretary Norton's view that it is sufficient to increase the Glacier and Yellowstone populations is a view born of ideology not science -- and it is not good for the long term survival of the grizzly in the lower 48.”
- “There is no biological reason to keep grizzly bears out of Central Idaho.”
- “Gale Norton's decision is not based on science or public sentiment.”
- “I am no wide-eyed liberal disappointed in this dictatorial turn of events. I am a registered Republican and Life Member of the National Rifle Association, but I am beginning to believe that no one in this whole administration ever reads and understands anything of scientific importance.”
- “I am very disappointed that Secretary Norton is ignoring the recommendations of FWS experts, independent scientists and thousands of public citizens in favor of grizzly recovery.”
- “We are deeply troubled by the fact that this decision was made without any input from federal, state, private, or academic scientists knowledgeable about grizzly bears or its recovery plan. The Interagency Grizzly Bear Committee (IGBC), composed of federal and state agency representatives who have overseen grizzly bear recovery efforts since the 1970s, as well as the US Fish and Wildlife Service grizzly bear experts, were completely ignored in this matter.”
- “The Grizzly Bear Recovery Plan of 1993 and subsequent additions to that plan underscore the importance of grizzly reintroduction to the Bitterroot Ecosystem. This Federal Register proposal, if adopted, would override the best advice that scientists and grizzly bear experts have provided to the Service for the past 10 years.”

- “WMI believes that the proposed actions are not well supported by science, and that they will impede grizzly bear recovery in the lower 48 states and delay the day when grizzlies can be removed from federal protections under the ESA. Further, we are extremely concerned that the proposal appears to have been developed without any input from the Interagency Grizzly Bear Committee, which has overseen 20 years of efforts to recover the species, or from any other federal, tribal, state or private scientists who are knowledgeable about grizzly bears and the grizzly bear recovery plan.”
- [The Nez Perce Tribe]...“The Decision to Select the No Action Alternative Ignores the Best Available Science. As indicated in the Final Rule, the recovery of grizzly bears pursuant to section 10(j) of the ESA is "necessary and advisable for the conservation of the grizzly." Final Rule at 10. The Preferred Alternative provides the key to the long-term survival of grizzly bears in the lower 48 states. The Bitterroot Ecosystem contains excellent habitat and four million acres of designated wilderness. In addition, it is one of the largest contiguous blocks of federal land remaining in lower 48 states. More importantly, the Bitterroot provides the necessary bridge to link Yellowstone grizzly bears with populations to the north. Absent the reintroduction of the 25 bears, the grizzlies in Yellowstone will remain in genetic isolation. If new genes are not introduced within three to four generations, the bears could suffer from inbreeding, posing a serious threat of irreparable harm to the species within a few decades. The bears in Yellowstone are currently less genetically diverse than those in Montana's Northern Rockies and in Canada. The Bitterroot could potentially support approximately 280 bears, increasing the number of grizzly in the contiguous United States by 25-30%, and significantly increasing the potential for long-term conservation and recovery of the grizzly bear. The No Action alternative, on the other hand, will not aid in the recovery of the species. As such, the selection of this alternative is not, based on the ESA's standard of the "best scientific and commercial data available" and is unsupported by the ROD.”

A few people request that Secretary Norton revisit the proposal to select the “No Action” alternative and instead utilize the best available science in the final decision regarding grizzly bear recovery in the BE.

- “I am asking you to look at what the local majority has said and act in the best interest of the sound scientific research which brought us to the decision to reintroduce bears to the Selway-Bitterroot in the first place.”
- “I wish you would look at public opinion and scientific research and support the reintroduction of Grizzly Bears to the Idaho/Montana wilderness.”

LAWS/RESTRICTIONS/RIGHTS/AUTHORITY (200)

ENDANGERED SPECIES ACT - GENERAL (201)

Impacts to the ESA from the selection of the “No Action” alternative:

Respondents comment on the impacts to the ESA from the reversal of the decision to reintroduce grizzly bears in the BE. They believe the selection of the “No Action” alternative will set a negative precedent and weaken the ESA. Some people believe the selection of the “No Action” alternative is a way for the administration to shirk their responsibilities under ESA. They feel the result will be a “sweeping under the rug” of grizzly bear recovery efforts in the BE.

Some people mention specific impacts to the ESA from the reversal of the decision to reintroduce grizzly bears in the BE.

- “During your confirmation hearings you swore you would uphold the Endangered Species Act...When people work hard together to find constructive plans to ensure a species survival it undermines the species prospects to delete that effort.”
- “To prevent this reintroduction plan will be to completely gut the 1973 Endangered Species Act which mandates recovery plans for endangered species.”
- “Despite the misinformation, scare tactics and anthropomorphism by opposition there is no national outpouring of support for the gutting the Endangered Species Act.”
- “... we have here another profoundly puzzling example of the pre-sent administration's obsession with undercutting and rendering ineffective the ESA and further paralyzing efforts to maintain a healthy, balanced remnant of the glorious natural environment which constituted this continent.”
- “However, the restoration of grizzly bears to north-central Idaho (and other potential habitat) IS mandated by the Endangered Species Act. To state, "we need to focus our grizzly recover efforts on areas that already support populations of them" is simply not true.”
- “...recent experience sends the signal that natural recovery may not be recognized or tolerated by the government. By refusing to officially recognize any grizzlies that may wander into the ecosystem is simply another way "to prevent grizzly bears from naturally re-establishing." Any accidental deaths from black bear hunting or other mortality would go unnoticed. Any bears in the area would go unrecognized. They

wouldn't be there, *ursa non grata*. It is a way to wash the agency's collective hands of its responsibility under the ESA.”

- “The grizzly bear is on the Endangered Species List, and dropping the recovery plans for the grizzly is a wonderful way to ensure the extinction of this magnificent animal.”
- “Strictly on a legal analysis, your actions violate your duties under the Endangered Species Act since they are listed under that law as a species threatened with extinction.”
- “It is a misuse of discretion to ignore the Endangered Species Act and clear scientific evidence of the impact that failure to introduce grizzly bears into Idaho will have on the Yellowstone grizzly.”
- “...why does a country as great as ours try to destroy the wild animals habitat and allow protection laws to be dismissed...”

Other respondents discussed the fact that the selected alternative to reintroduce grizzlies under citizen management is a unique landmark in endangered species management, in that it allows local citizens to implement the recovery actions. They state this approach has never been tried under the ESA, and has such promise that it should not be halted.

- “The reintroduction plan not only meets requirements of the Endangered Species Act, it represents a landmark in endangered species management by allowing local citizens to have an active role in decision-making.”
- “Hasn't the major criticism of how the endangered species act has been implemented, that local concerns have not been taken into consideration? Here's a plan that makes local control its centerpiece. This is the kind of effort that should be applauded and encouraged, not kicked in the teeth. It should be held up as a model for recovery plans for other endangered species.”
- “The reintroduction plan not only meets requirements of the Endangered Species Act, it represents a landmark in endangered species management by allowing local citizens to have an active role in decision-making.”

Petition #1 includes the following:

- “We urge you to support the huge undertaking that is being worked out by local people, business people, and conservationists who are all willing to help this significant animal and its recovery under the Endangered Species Act...We urge you to support this reintroduction plan chosen by local people in compliance with the ESA.”

Some people discuss the reasons that Congress enacted the ESA in 1973. They argue that Congress recognized the federal government would have to oversee the protection of species threatened with extinction, because the pressure of local interests would make it impossible to address the needs of these species. Some feel the selection of the “No Action” alternative would set a dangerous precedent in the debate over states rights versus federal jurisdiction.

- “Congress enacted the ESA in 1973 because they recognized the importance of protection and recovery of rare and declining species and their habitats and the maintenance of biodiversity. Very importantly, Congress also recognized that these goals couldn't possibly be accomplished without federal action because the pressure of local interests make it virtually impossible to adequately address the needs of many listed species; that's why it is a mandate of federal agencies (Departments of the Interior and Commerce.)”
- “May I remind you that grizzly recovery is pursuant to the Endangered Species Act (ESA), a federal law. One of the main concerns prompting its passage was that individual states were not taking the actions needed to save endangered species and, in fact, their actions often contributed to the plight of those species. Nothing in the ESA gives states a right to veto plans for recovery of threatened or endangered species. Such a provision would effectively emasculate the law and the national policy it represents.”
- “The decision is in direct conflict with the Endangered Species Act and puts more importance on pleasing a governor than upholding the law.”

Comments on the ESA status of the grizzly bear:

Many people comment on the ESA status of the grizzly bear. Some think it is not a species that threatened with extinction, as its ESA status connotes. Others think it should be upgraded from threatened to endangered status, because the species is not recovering adequately. And some people specifically say that grizzly bears were never native to the BE, and therefore should not be reintroduced under the ESA. Some say they should be reintroduced to their entire historic habitat, including California and other areas. One person calls for delisting the grizzly bear.

Some people do not believe the grizzly bear is a threatened species. They feel there are numerous grizzlies in North America, and thus they should not be protected under ESA in the lower 48 states.

- “The grizzly bear is not an endangered species. And no one has convinced us that grizzly bears were indigenous to the Bitterroots in the first place! If they were indigenous, the bears would now be living in the wilderness naturally.”
- “Grizzly bears are not truly an endangered species as their numbers are substantial.”

- “As is the case with wolves, grizzly bears...are not actually endangered as a species. They would be officially classified as an "experimental, non-essential" species, just as the Canadian wolves are currently. There could be no advantage to the natural gene pool.”
- “I feel the grizzly bear is not truly an endangered species due to the large populations in Canada and Alaska and feel this proposed plan is a waste of my tax dollars.”
- “Grizzlies, as a species, are not endangered or even threatened. Populations in Canada and Alaska, when added to the lower US '48' populations, adds up to about 40,000 animals.”
- “Please reinforce the requirement to delist the grizzly bear off of the Endangered Species List.”

However, other people think the grizzly bear should be afforded more protection under the ESA and upgraded from threatened to endangered status.

- “Their classification should be changed from threatened to endangered, as various conservation groups have pleaded with the Bush administration.”
- “We are concerned about the precarious state of grizzly bears in the above ecosystems especially in the North Cascades (NCE), where grizzlies are virtually hanging by a thread. The USFWS has agreed that the population warrants "endangered" status under the ESA. Recovery plans have been stalled for the past 6 years, despite the completion of a habitat analysis that found the NCE could support 300-400 bears.”
- “The Service should begin by listing the Cabinet-Yaak and Selkirk Grizzly populations as Endangered under the ESA and promptly designating their critical habitat.”

One person does not believe the grizzly bear is native to the BE, and thus should not be reintroduced or recovered there.

- “The U.S. Fish and Wildlife Service has no business meddling in the affairs of the various States. Grizzly bears should NOT be introduced (notice I say introduced since there is no proof that a viable population ever existed in the Bitterroot-Selway area.) into the Selway-Bitterroot Wilderness.”

One person thinks grizzly bears should be reintroduced to their entire historic range.

- “If the true aim of "re-introduction" is RE-INTRODUCTION, why not place grizzlies in their proven former habitats such as Sacramento, De Moines, and the entire Great Plains area?”

ESA regulations with respect to grizzly bear recovery in the BE:

Some people comment that the Grizzly Bear Recovery Plan identifies the BE as a recovery area, and thus under ESA regulations, grizzly bear recovery in the BE must be actively pursued by FWS.

- “The Bitterroot Ecosystem is identified as a recovery area in the 1993 grizzly bear recovery plan. Correspondingly, grizzly bears must be restored to this area before the species can be delisted under the Endangered Species Act. A decision to take no action on grizzly restoration in this area will delay the time when this species can be delisted and is absolutely contrary to the Secretary's responsibility under the Endangered Species Act to recover listed species.”
- “It is the job of Gale Norton to enforce the Endangered Species Act and the Bitterroot has been designated as one of the grizzly recovery areas by the U.S. Fish and Wildlife Service. Do your job Mrs. Norton.”
- Grizzly bear recovery is mandated by the Endangered Species Act.

A few people specifically comment on the selected alternative and the designation of the reintroduced populations as “nonessential experimental” under section 10(j) of the ESA. A common question is whether recovery of a “nonessential” population justifies the risk to human safety – most believe human safety is more important.

- [Governor Kempthorne]“... Common sense dictates that section 10(j) authority should not be exercised in a manner that places in "jeopardy" the lives and livelihoods of those individuals who must shoulder the regulatory burden. In such a situation, reestablishment of the affected species not only will face the obstacles imposed by new habitat but also will not profit from the tangible and intangible benefit of a populace committed to the experiment's success...”
- “The Idaho bears would be classified as a non-essential, experimental population under ESA 10(j). Endangering or taking human lives is certainly not justified in this context.
- “While grizzly bears are listed as a threatened species under the Endangered Species Act, the ESA does not require the U.S. Fish and Wildlife Service endanger the human population with ill- conceived plans such as this.”

General comments on the ESA:

Other respondents generally comment on the ESA and specific regulations. They believe the ESA regulations mandate management actions to conserve and recover listed species and the habitats upon which they depend. One person feels the ESA is too broadly interpreted and should not include grizzly bears within the lower 48 states.

- “The Endangered Species Act clearly states that species should only be restored to their former range where it is practicable.”
- “...feel the Endangered Species Act is being too broadly interpreted to include the grizzly bears of the lower 48 state for special considerations under the provisions of this legislation.”
- “The Endangered Species Act mandates that the USFWS conserve listed species and the ecosystem upon which they depend. The USFWS is the primary agency responsible for conservation of listed species, including the grizzly bear, and for implementing steps that would lead toward recovery and eventual removal from listed status.”
- “The Endangered Species Act requires the Service to declare critical habitat and obtain lands in connection with recovery of species threatened with extinction, in addition to limiting or eliminating conflicting land uses. Such actions would include outright acquisition of, or negotiating for conservation easements on, private lands and denying grazing permits in critical habitat areas on public lands. Connecting corridors must be acquired and man's commercial activities curtailed or bears will never recover nor will the ever decreasing numbers of migratory ungulates stabilize.”
- “It is our job under law according to the 1973 Endangered Species Act that we must do all we can to protect endangered and threatened species. Ecosystems that have their full array of wildlife, including large predators are healthier and more complete, and without, they are out of balance...We must not think just of our survival but of the future generations, as well as the survival of life on earth.”

One person writes that the ESA is unconstitutional and should be abolished. Another respondent believes the ESA should be driven by politics, and science should have no bearing on ESA decisions.

- “The Endangered Species Act is unconstitutional! Social engineering like the Endangered Species Act should be abolished as unconstitutional, but most of all, ESA is against God's Law--the 10 Commandments.”
- “I strongly agree with Interior Secretary Norton's decision to not reintroduce grizzly bears into the Selway-Bitterroot Wilderness. Scientific opinion advocating reintroduction is irrelevant. Scientific opinion does not trump common, collective,

political opinion in our system - much to the chagrin of intellectual elitists. The decision whether to reintroduce the bears is purely political. The Endangered Species Act (ESA) was not divinely mandated. It is merely the political fulcrum for proponents without which no one would have ask for scientific opinion.”

A few respondents comment on the economic impacts of the ESA to local communities. Most impacts mentioned are associated with land-use activities like ranching, grazing, agricultures, etc. One person makes a comparison to gray wolf recovery and states there have been minimal economic impacts, and quite a few benefits since wolves were reintroduced.

- “One of our great concerns is the economic impact upon our entire locale. A study conducted in northwest Wyoming (Anderson, et al: 1996) shows conclusively that livestock losses due to grizzly predation are often devastating to cattle producers. Lemhi County consists of an area that is 92% public lands...The Endangered Species Act has been used as a tool to severely restrict agriculture here. This has been accomplished by the reintroduction of wolves from Alberta, restriction of irrigation water to meet the theoretical needs of salmon and steelhead, and the threat of lawsuits by John Marvel to close off irrigation ditches under the guise of the preservation of bull trout...cumulative result of these actions is the uniform opinion of our residents that no more action on the part of ESA advocates is necessary. ... We see no way that these losses can be offset by tourism...Although it could be argued that the loss of people who venture between a grizzly sow and her cub is merely Darwinian mechanics at work, gory details of such an encounter can do little to promote tourism in the backcountry.”
- “Because of the Endangered Species Act we have lost jobs, life styles and many other things. We have lost all rights to live here and be free to do the things we did before the Endangered Species Act became law.”
- “I ask that all of you strike the idiotic laws and regulations of ESA and CARA before you kill another fireman, make another farmer sell land, or allow another field to waste away bone dry.”
- “People fought against the reintroduction of wolves to Yellowstone. Since they have been reintroduced, there has been almost no impact on livestock in the surrounding area, and the ecosystem in general is healthier, even those animals the wolves prey on. Let grizzlies back into the Bitterroot. They belong there, and we will all benefit from their presence.”

Comments about the ESA and grizzly bears:

Some people make generic comments that the grizzly bear should be protected under the ESA. Some refer to the selected alternative to reintroduce grizzly bears as a

“nonessential experimental” population. They state that the grizzly should be reintroduced to the BE with full protection of the ESA.

- “Please reinstate the grizzly in Idaho under full protection of the ESA.”
- “I want that grizzly bears continue to be protected under the Endangered Species Act.”
- “... the grizzly bear is a threatened species that must be protected. It's up to us to ensure its' population: It's the law.”
- “The majority of Idahoans support the bears reinstatement and believe they should be fully protected in Idaho under the Endangered Species Act.”
- “I am a firm believer in the ESA and would like to see all species recovered in all possible locations.”
- “...we are deeply concerned with the apparent disregard demonstrated by the Secretary for a species that she is responsible for recovering. The grizzly bear has been listed under the Endangered Species Act (ESA) as a threatened species in the lower 48 contiguous United States since 1975 (26 years), and currently there are only an estimated 800-1,200 individuals remaining in the lower 48 contiguous states. Both distribution and population levels of this species have been seriously diminished due to excessive human-caused mortality and loss of habitat. In the lower 48 contiguous states, their range has been reduced to <2% of historic range and all five remaining populations are too small and isolated from each other to assure long-term persistence. Most remaining grizzlies occur in Yellowstone and Glacier National Parks and the Bob Marshall Wilderness of Montana, and overall, they continue to occur as small, fragmented populations in only four northwestern states, Montana, Idaho, Wyoming, and Washington. Although the Yellowstone NP has an estimated 400-600 grizzlies and Glacier NP has an estimated 300-400 grizzlies remaining, the other 3 populations (NW Montana, N Idaho, NW Washington) are dangerously small, ranging from 5-50 individuals each. We feel that any delay in recovering the SBE population of grizzly bears is completely contrary to the given responsibility of the Secretary of the Interior to conserve and recover ESA-listed species and, further, that it could even be considered unethical not to do so.”

ESA AUTHORITY/RESPONSIBILITY FOR GRIZZLY BEAR RECOVERY **(202)**

FWS Authority and Responsibility Under ESA to Recover Grizzly Bears:

ESA Mandate to FWS:

Many respondents feel strongly that the ESA mandates the FWS to conserve listed species and the habitats upon which they depend. They remind the FWS that its actions must lead to recovery of the species, and it must recover all listed species. Since grizzly bears are listed as a threatened species, the FWS is required under ESA to take all actions necessary to recover and delist the species in the lower 48 states. Many emphasize that the ESA is the law and FWS is mandated to abide by it.

- “The Endangered Species Act mandates that the USFWS conserve listed species and the ecosystem upon which they depend.”
- “The Department of the Interior is mandated through the ESA to take actions necessary to conserve and recover endangered and threatened species and the ecosystem upon which they depend. To our knowledge, the Secretary does not have the authority under the ESA to pick and choose which species she might feel like recovering and which ones she doesn't feel like recovering at any given time.”
- “We remind the Service that it has an affirmative duty under the Endangered Species Act to recover all listed species; to base its decisions on the "best available scientific and commercial data"; and to take only those actions which lead to recovery of the species. The Proposed rule fails to meet each of these tests.”
- “The personal views of Gale Norton on the legality of this law is irrelevant. Your job, and hers, is to enforce it!”
- “You are required under the Endangered Species Act to work to save grizzly bears because they are listed under that law as a species threatened with extinction. Once a species is extinct, that is forever. Does this not concern you? I believe that as Secretary of the Interior, it should give you great concern. You are not placed in office to follow your own personal or anyone else's personal agenda -- you are charged with the solemn task of protecting our natural resources and wildlife in this country, regardless of political affiliation. Your actions are completely partisan and transparent, and against the public majority opinion. It seems that you mean to use your position of Secretary of the Interior to gut and pave over the interior of this country. After this administration leaves office, and hopefully you with it, there will not be a tree or an animal left in this entire land. ... Why do you wish to take away our basic rights as citizens?”

FWS Responsibility to Recover Grizzly Bears:

Numerous people further comment that recovery of grizzly bears will only be accomplished in the lower 48 states with the added grizzly bear population in the BE. They refute the NOI statement that the Bitterroot reintroduction is a discretionary action, and state they believe it is necessary under the FWS ESA mandate to recover listed species. They discuss the importance of a robust population in the centrally located BE, to facilitate gene flow between populations and marginalize any disastrous effects to recovery from disease or catastrophic events in other populations.

- “The Service has legal requirements under the Endangered Species Act (ESA) to recover grizzly bears. The purposes of ESA are: "to provide a means whereby ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species, and to take such steps as may be appropriate to achieve the purposes of the treaties and conventions set forth in subsection (a) of this section". Conserve, conserving, and conservation are defined within the ESA as to use and the use of all methods and procedures that are necessary to bring any endangered or threatened species to a point at which the measures pursuant to the Act are no longer necessary...The Grizzly Bear Recovery Plan, Bitterroot Chapter of the Recovery Plan, Final EIS, Record of Decision, and Final Rule all conclude that recovery of a grizzly bear population in the Bitterroot Ecosystem will significantly increase long-term survival probabilities and conservation of grizzly bears, and is necessary to meet the objectives of the Grizzly Bear Recovery Plan - to recover grizzly bear in the conterminous 48 States as legally required by the ESA.”
- “The Service states in the proposed ROD for the Grizzly Bear Recovery in the Bitterroot Ecosystem Environmental Impact Statement (EIS), "establishment of an experimental population is a discretionary action". We believe this assertion is inaccurate. The volume of scientific data, analysis, and conclusions presented in the above-mentioned documents indicate the recovery of grizzly bears in the Bitterroot Ecosystem is not discretionary, given the statutory requirements of the ESA, and the congressional mandate of the Service to recover and conserve listed species and the ecosystems upon which they depend. Further, the proposal to select the No Action Alternative is inadequate to meet the Service's legal requirements under the ESA to recover grizzly bears in the lower 48 states. As stated above, all scientific conclusions reached by the Service thus far indicated recovery of grizzly bears in the Bitterroot Ecosystem is necessary, recovery will not occur naturally, and reintroduction will be required.... [All USFWS NEPA documents] conclude that grizzly bear recovery will require reintroduction of bears from other areas because natural recovery is highly unlikely given scientific data collected from 575 radio-collared grizzly bears over the last 25 years.”

- “We also note that perhaps the single best action Interior could take to benefit existing grizzly populations would be to restore grizzlies to the BE.”
- “As an educator, I teach a responsibility each of us has in regard to following the law. When the law of the land states we are to preserve endangered species than we must...even though it may be somewhat discomforting.”
- “You are required under the Endangered Species Act to work to save grizzly bears because they are listed under that law as a species threatened with extinction.”
- “First I must remind you that your charge and that of the US Fish and Wildlife Service under the Endangered Species Act is by law to ensure the recovery of endangered species, in this case the recovery of the grizzly bear in the lower 48 states.”
- “Even though you personally hold the Endangered Species Act in high disregard, you have a public mandate to protect the Grizzly bear and follow the law. The American public does not hold the environment with such disdain as you have shown. I know there is no money in it for you,. but during your four years in the role of Interior Secretary, please follow the law and the will of the American people.”
- “These magnificent animals are on the Endangered Species List, and you should be using every measure possible to ensure their survival.”
- “It's plain to see that you and other high rollers like yourself would like to do away with the ESA altogether but you haven't yet. And if we, the people, have anything to say about it, this act will stay intact for a long time to come. As it is now, with the ESA presently in effect, we (you) are required to work to save grizzly bears because they are listed under that law as a species threatened with extinction.”
- “You are required under the Endangered Species Act to work to save grizzly bears because they are listed under that law as a species threatened with extinction. Unless you plan on disabling the ESA also.”
- “Grizzly bears are listed as a threatened species under the Endangered Species Act, therefore the U.S. Fish and Wildlife Service is required to work to save grizzly bears - not to cater their extinction due to some decision maker who doesn't value other natural species.”
- “I feel strongly that the US Fish and Wildlife Service should execute its duties under the Endangered Species Act and provide a plan for maximum recovery of the lower continental US grizzly population. The stocking of grizzly bears in the Greater Salmon-Selway ecosystem would have been a first step in providing another critical bear population which would serve as an ecological bridge between other established grizzly bear populations.”

Comments on Selected Alternative and ESA:

Supporters of the Selected Alternative (Alternative 1) comment that this plan would actively meet the FWS responsibilities under ESA to recover grizzly bears. These comments urge the Secretary of Interior to continue implementation of this alternative to recover grizzly bears in the BE. The state the Secretary has a legal and moral obligation to aggressively recover grizzly bears in the BE, and not simply continue the status quo (no grizzly recovery).

- “The Services states in the proposed ROD that "establishment of an experimental population is a discretionary action.” That may be true, but recovery of the species is not discretionary, nor is it discretionary in the Bitterroots. The Service's own Recovery Coordinator and hundreds of bear biologists; conservation biologists and scientists from around the world have deemed that recovery of the bitterroot is necessary and the most important bear recovery effort in the lower 48 states today. The experimental population designation is the only discretionary part of the effort, and it was done that way only to appease the national, state and local political officials and businessmen, and citizens. It was done that way to break new ground in the ESA discussions and the future of recovery efforts and as a promise to citizens that the Service is trying to improve the function of the ESA. It is a reward for those who wish to come to the table and to assist in recovery and not threaten with legal challenges. It was done that way because the Service was set to prove that it could do business in a people friendly fashion and still recover controversial species.”
- “Why is it the Interior Dept. feels we can't reintroduce grizzly bears back into the remote Bitterroot refuge? After all they are an endangered species? As I understand it the citizens of Montana and Idaho will be responsible for the introduction. Who better to oversee the saving of an almost extinct creature? Surely not the Federal Government. President Bush wants to give back the responsibilities back to the states. He should live up to his words. Act to work to save grizzly bears because they are listed under that law as a species threatened with extinction.”
- “As indicated in the Final Rule, the recovery of grizzly bears pursuant to section 10(j) of the ESA is necessary and advisable for the conservation of the grizzly.”... The Preferred alternative provides the key to the long-term survival of grizzly bears in the lower 48 states...More importantly, the Bitterroot provides the necessary bridge to link Yellowstone grizzly bears with populations to the north. Absent the reintroduction of the 25 bears, the grizzlies in Yellowstone will remain in genetic isolation. If new genes are not introduced within three to four generations, the bears could suffer from inbreeding, posing a serious threat of irreparable harm to the species within a few decades. The bears in Yellowstone are currently less genetically diverse than those in Montana's Northern Rockies and in Canada.”
- “I strongly urge you not to block the grassroots movement to reintroduce grizzly bears to the Bitterroot-Selway wilderness. As Secretary of the Interior, you have

been entrusted with the stewardship of our natural environment as well as our natural resources. Grizzly bears are listed under the Endangered Species Act as a species threatened with extinction, and it is therefore your legal obligation, as well as a moral one, to work to protect them.”

One respondent believes the BE is identified in the Grizzly Bear Recovery Plan, and thus restoration must be accomplished before delisting can be considered in other populations.

- “The BE [Bitterroot Ecosystem] is identified as a grizzly bear recovery area in the Fish and Wildlife Service's 1993 Recovery Plan. Restoration of grizzly bears to the BE is a crucial step that must be accomplished before serious consideration can be given to delisting the grizzly bear from federal protection under the Endangered Species Act.”

Implementing the ESA versus playing politics with grizzly bear recovery:

Many people comment that grizzly bear recovery decisions should not be driven by political pressure. They believe the lawful implementation of the ESA has no room for politics.

- “The grizzly bears need the full protection of the Endangered Species Act. This issue is not a political football; undermining protection to please a few uninformed extremists is not good policy.”
- “It's important that the Service remember that grizzlies are a nationally listed species, with recovery taking place primarily on public lands belonging to all Americans. Here, it's important to note that of the 24,251 citizens expressing an opinion, over 70% supported reintroduction. As such, it is totally inappropriate (not to mention illegal) to give veto power over the national will or policy to either locals or an area governor. The ESA also contains no exemptions for political pandering to a small, unrepresentative, anti-conservation minority.”
- “If this is shot down, we can only believe that this administration has no true regard for restoring endangered species. Please show good leadership and allow citizens to restore to the land what makes it a true wilderness.”
- “I OPPOSE Interior Secretary Norton's "johnny-come-lately" proposal to abandon grizzly recovery and to adopt instead an official position of "no action". Grizzly bears ought not be treated as political footballs to be kicked back and forth across the ideological field. The US Fish and Wildlife Service holds the public's trust to protect these animals as creatures and symbols of the American Land.”
- “I am writing as a longtime resident of the Great Northwest. My comments are simple: please don't let politics override good science and democracy. Please do not contravene the Endangered Species Act, one of the most important, effective, and enlightened pieces of legislation in any developed nation.”

ESA Ramifications with Respect to the Proposal to Select the “No Action” Alternative:

Many people criticize the federal government for reevaluating the ROD which selected a proactive and forward-thinking plan to recover grizzly bears in the BE – and proposing to select a “No Action” alternative. Respondents believe the selection of the “No Action” alternative would be a breach of ESA responsibilities to recover a listed species. They criticize the Secretary of Interior and FWS for proposing such an act, and urge that they legally fulfill their responsibilities under ESA.

- “One of the most disturbing aspects of the proposed change in the existing Record of Decision is the fact that the decision was made without any federal, state or private scientific input. No scientist knowledgeable about grizzly bears or the grizzly bear recovery plan was consulted before this decision was reached. We believe that this is a breach of the Interior Secretary's responsibility to endangered species recovery.”
- “...we believe that the Service and the Department of Interior abrogated their responsibilities under the ESA by submitting to the state of Idaho's demands for no grizzly reintroduction and recovery efforts in the Bitterroot Ecosystem. Further, without any significant new and additional information that contradicts the conclusions and decisions documented in the Recovery Plan, Bitterroot Chapter of the Recovery Plan, FEIS, ROD, and Final Rule, a decision to rescind the reintroduction effort is without scientific, social, or legal foundation.”
- “We urge the Secretary to abandon the proposal to replace this ROD with a “no action” alternative that would leave this large area of suitable grizzly bear habitat in designated wilderness areas and adjacent national forests without grizzly bears. The Bitterroot Ecosystem is identified as a recovery area in the 1993 grizzly bear recovery plan. A decision to take no action on grizzly restoration in this area will delay the time when this species can be delisted and is contrary to the Secretary's responsibility under the ESA to recover listed species.”
- “Further, We are deeply concerned with the apparent disregard demonstrated by the Secretary for a species that he is responsible for recovering. Although the Yellowstone NP has an estimated 400-600 grizzlies and Glacier NP has an estimated 300-400 grizzlies remaining, the other 3 populations (NW Montana, N Idaho, NW Washington) are dangerously small, ranging from 5-50 individuals each. We feel that any delay in recovering the Selway-Bitterroot Ecosystem population of grizzly bears is completely contrary to the given responsibility of the Secretary of the Interior to conserve and recover ESA-listed species and, further, that it could even be considered unethical not to do so....we have an ethical responsibility to recover this (and all) species that are endangered or threatened. This is an important argument that should not be ignored.”

- “How does not reintroducing grizzlies into the Bitterroot Ecosystem restore and conserve that area? And please keep in mind that these federal lands belong to me as much as they do to anyone else. Please let your actions be dictated by the spirit and intent of the Endangered Species Act and not politics of the current administration.”
- “I am opposed to Secretary Gale Norton's proposal to adopt the no action alternative. It is my opinion that such a position undermines the Federal Endangered Species Act by excluding a proposal that has the potential to benefit a species on the road to recovery.”
- “To abandon this recovery plan and substitute a "no action" alternative which has no basis other than perhaps political is to abandon recovery of this endangered species. To abandon grizzly recovery is in direct contradiction of your charge under the Endangered Species Act, which is to ensure recovery of at-risk species.”
- “If you refuse to protect these highly endangered species, we will use every legal and political means at our disposal to let the American public know that the officials charged with enforcing laws in the public interest are in fact violating those very laws.”
- “If bears do exist in the area, the likelihood of survival is diminished because necessary, proactive management under the ESA has not been taken. Examples include habitat protection in land management plans, guidelines for keeping hunting and other campsites clean, and better management of black bear hunting regulations to avoid accidental grizzly mortality.”

Authority and Responsibility for Grizzly Bear Recovery – Federal, State, Tribal:

Many respondents discuss the Congressional intent for establishing the ESA in 1973. The federal government was given responsibility for recovery of threatened and endangered species, because Congress believed local political pressure would overwhelm recovery decisions and actions. They perceive the re-evaluation of the ROD and proposal to select the “No Action” alternative as the Secretary of Interior allowing the State of Idaho to have veto power over recovery of a listed species. Respondents further criticize that this apparent complete federal deference to state preference in recovery planning sets a dangerous precedent, not only for grizzly bears but for recovery efforts of other species as well. This is a volatile issue in a number of public comments.

- “While developing the FEIS the Service listened to the Governor’s and Idaho Fish and Game Commission's concerns. They addressed every concern shy of stopping reintroductions. They changed the Draft and added alternatives, they contracted the best biologists in the nation to conduct habitat quality analyses, they moved boundaries, and they changed the special rule several times to adjust to private concerns, the Attorney General’s concerns, and the Governor’s concerns. They did everything they could and still it was not enough. The Governor just couldn't see

past his misperception that grizzly bears are "ill tempered flesh eating carnivores" and was able to change the course of a dozen years of democratic process with the mere threat of a law suit and closed door political maneuvering. Misleading the debate for political gain is a shallow ploy that had never worked with the service previously. I am deeply disappointed in the US Fish and Wildlife Service; where enforcement of the ESA is suppose to be the last hold against politics and for the species in jeopardy."

- "Now the Service is reversing its legacy of managing under legal mandates and framework of the ESA if the state's governor opposes recovery efforts. This is a dangerous precedent setting decision that could change the Federal government authority in these matters forever."
- "Although some opponents of grizzly bear recovery make the argument that this is a states rights issue, there is no question that when it comes to the ESA, this ultimately is a federal issue, and the federal government, after involving the states and other interested parties, has to step up, take responsibility, and do the right thing."
- "We can only wonder as to what is behind Secretary Norton's misguided decision to reevaluate the ROD, but it appears to us that the current administration is allowing the recovery of federally listed species to be dictated to the governor of one state. Further, we note with interest that Secretary Norton's withdrawal of the existing grizzly bear reintroduction preferred alternative in favor of a "no action" alternative is the very first time in history of the USFWS or the ESA that an existing Record of Decision has ever been withdrawn. Are we to assume that this action is typical of the intentions of the current administration toward endangered and threatened species and their recovery?"
- "... the Society for Conservation Biology believes that it is inappropriate for the Department of Interior to abandon it's responsibility to recover listed species because of opposition from local officials. If the preferences of state officials had been followed, there would have been no restoration of wolves to the BE or GYE in 1995 and no restoration of wild populations of black-footed ferrets. The Endangered Species Act was enacted because Congress recognized the importance of maintaining biodiversity and of restoring declining species. Such goals cannot be accomplished without federal action because the pressure of local interests makes it impossible to address adequately the needs of declining species. Although involvement of local officials in recovery efforts is certainly valid, giving such officials veto power over recovery efforts for federally listed species is not. Such a policy has dangerous implications for all listed and declining species."
- "The stated reasons for rejecting the existing ROD are invalid. The public record clearly reflects that the main reason the DOI is proposing to abandon grizzly bear recovery in the SBE is to mollify the governor of Idaho who has based his adamant opposition to the recovery plan on his position not to have these "flesh-eating

carnivores," in his words, returned to public lands in the Bitterroots. The Secretary's position in this regard raises the specter of whether it is the policy of this DOI to grant state-elected officials an effective veto power over enforcement of the ESA."

- "Regarding objections of the affected states, complete federal deference to state preference in recovery planning sets a dangerous precedent, not only for grizzly bears but for recovery efforts of other species as well. Recovery of a large percentage of listed species can only occur with federal planning and support. If the preferences of local officials had been followed for wolf reintroduction into the Yellowstone and Bitterroot ecosystems, the restoration of gray wolves to near the point of meeting recovery goals for delisting in only six years would not have happened."
- "Our whole purpose for making the protection of endangered species and their habitats a national rather than state mandate is so that local, shortsighted interests could not thwart the best interests of our country, which are clearly to ensure the perpetuation of our wildlife heritage. The long journeys that people make to visit our national parks and potentially view species like wild grizzly bears are testament to the inherent value that we place on wild lands and wild (specially large, charismatic) species. I am well aware that some people would just as soon not have large predators live near them, and maybe not even have wild lands near them, but if collectively we let each local constituency have their own way, all of the wild things that we appreciate would disappear. It is the role and responsibility of the federal government to ensure that this does not occur."
- [The Nez Perce Tribe]... "The Tribe Was Not Consulted Prior to Initiation of This Action. The Notice of Intent states: "we strongly believe that the only way to effectively recover grizzly bears is with the help and support of affected States. In order to achieve this, we will continue to work in close cooperation and consultation with States and local governments." This statement is both factually and legally inaccurate. First, in addition to consultation with states and local governments, the FWS has an obligation to engage in meaningful government-to-government consultation with affected tribes. As the Tribe was to be a member of the Citizen Management Committee that was created to oversee the recovery operations and because the recovery operation will affect treaty-protected resources within the Tribe's ceded territory, consultation, prior to the issuance of the Notice of Intent fails to recognize the necessity of future consultation with Tribe during any further discussions regarding grizzly bear recovery. This contradicts the Final Rule's guarantee that grizzly bear recovery will be undertaken "in cooperation with...the Nez Perce Tribe." Final Rule at 8. Should any additional discussion regarding grizzly bear recovery take place, the Tribe must be consulted and be involved in all decision making regarding the future of grizzly bear recovery operations."

Other respondents mention the intent of Congress in the ESA was to write the Act to facilitate cooperation between states and the federal government in recovery actions for

listed species. Some people, mostly local Idaho and Montana residents, believe the federal government is not involving them in the decision process and is instead forcing its will on the states and local residents.

- “The intent of the Congress when passing the Endangered Species Act was that cooperation with States was to be facilitated when seeking an introduction under the ESA. No such facilitation has occurred in the case of wolf or grizzly introduction. The USFWS has mandated introductions of wolves and grizzly bears over the protests of Idaho Governors, Idaho Legislatures and a large majority of Idaho citizens.”
- “All of the State of Idaho's elected officials oppose grizzly reintroduction. Reintroduction frustrates the Congressional intent of ESA 10(j), as this section facilitates state cooperation where the reintroductions are to occur.”
- “The experimental, non-essential population provision, an exception in the ESA to be used cautiously, is now the norm. It is being used in every single reintroduction. That was not the intent of the ESA. There is a serious question whether it applies in this case.”

Societal Responsibilities under ESA:

Many respondents feel that grizzly bears and other listed species are in trouble because of human actions. They make the point that we have a moral, ethical, and societal obligation and responsibility to support all actions to recover them under the ESA.

- “We have a societal obligation to actively attempt restoration of species which have become threatened and endangered through past human short-sightedness. Our restorative efforts will be greatly appreciated by future generations. Our children deserve to inherit an earth with it's full complement of species, predators and all.”
- “Grizzlies, as well as all other animals, deserve a "place" to live because it's their planet, too. As a Montanan, I take pride in our abundant wildlife. If we are truly the last best place, let's prove it through our unselfish decision to share the land with its original citizens, the animals.”
- “It is criminal if we allow this symbol of America to be denied the land from which it lived before we came and destroyed its habitat. It is our responsibility to conserve the animals and this planet from further destruction and extinction.”
- “Humans are the reason that grizzly bears and many other species are at risk, and now humans need to bring about a solution to end the endangerment of these magnificent creatures.”

- “The grizzly bear is a threatened species. We must all do what we can to help these majestic animals proliferate. It is a moral obligation, and it is the law. Restoring grizzlies to the Selway-Bitterroot will help to ensure the health and survival of the grizzly species itself.”

COMPLIANCE WITH FOREST PLANS (203)

Only a few people comment on the issue of compliance with Forest Plans. None of these comments specifically mention the Bitterroot grizzly bear recovery project. The comments focus on grizzly bear management in the Yellowstone Ecosystem. The common theme is that respondents believe the federal government is not managing grizzly bears and their habitat adequately to recover the species.

- “Then, several years ago, the Targhee Forest started a Forest Plan revision. To make a long story short, a road subcommittee of Yellowstone Grizzly Bear Committee (YGBC) proposed extremely low road density standards for grizzly bear habitat (0.6 mi. of road per sq. mi. of land). The YGBC approved the road subcommittee's recommendation (without public input) and sent it to the surrounding forests for their consideration. The Targhee Forest adopted the road density standard for the grizzly bear management strategy in the forest plan revision (also without public input) Only when was the Forest Plan released for public input and of course, the road density standards were set in stone by then.”
- “... the facts disprove that the government is interested in recovering grizzlies in areas where populations are known to exist. Recent efforts by the administration to lease for oil and gas in sensitive grizzly habitat; ... USFWS efforts to delist grizzlies in the Yellowstone ecosystem; the recalcitrance on the part of the federal government, as evidenced by the successful lawsuit by AWR (Alliance for the Wild Rockies) and others, in providing adequate protection for grizzlies in the Cabinet-Yaak and Selkirk areas; the failure to expand grizzly recovery areas to coincide with actual use areas and science; ... and the failure to implement court-ordered forest plan amendments on the Flathead for grizzly protection, are all proof that the government is hostile to grizzly recovery.”

LOCAL CONTROL (204)

The Citizen Management plan and the Issue of Local Control:

The majority of respondents support the selected alternative to reintroduce grizzly bears under Citizen Management. They comment that the Bush administration holds the position that local residents should be involved in decisions that impact their lives and livelihoods. Many state that the selected alternative is unprecedented in the local

involvement in the preparation of the plan, and also in the level of involvement in grizzly bear management decisions through the Citizen Management Committee. Most then question why the Bush administration is attempting to shelve the Citizen Management plan, when it provides so many components of local involvement and control.

- “The citizen management plan is an innovative way to make federal wildlife laws work for grizzlies while respecting the interests and concerns of local citizens. Secretary Norton should embrace it as a model of common sense conservation. The citizen management plan can be a model for wildlife recovery efforts by giving local residents confidence that their concerns will be addressed in decisions about imperiled wildlife where they live.”
- “President Bush has stated that he wants to give the people and the States more authority and to reduce Federal intervention in the lives of citizens.”
- “... Terry Anderson- the free -market economist and Western property rights advocate from Bush's transition team who championed her appointment-was praising the Selway-Bitterroot grizzly plan in Washington DC. Dr. Anderson devoted special attention to the grizzly plan because of its innovative, collaborative approach and consideration of local concerns.”
- “Grizzlies kill calves, yes. Outside the wilderness boundary. Yes, compensate the owners fairly. There is inherent risk in any kind of ranching and everyone knows this right up front. Problem Grizzlies (outside the wilderness area and possibly within) should be managed as needed. Let the politics decide what to do here. (I thought this was going to be left to local control of a mixed board of stakeholders. Oh yeah, good ole boy politics got in the way of this.) We Idaho politicians cry and moan for local control, but now it seems we only want local control if it works for our purposes. What a bunch of hippos.) Problem Grizzlies? Kill 'em if that is what is needed. So what? Make them into a rug. But, it is morally wrong to mess with the population at large. It is wrong not to reintroduce these animals.”
- “Why is it the Interior Dept. feels we can't reintroduce grizzly bears back into the remote Bitterroot refuge? After all they are an endangered species? As I understand it the citizens of Montana and Idaho will be responsible for the introduction. Who better to oversee the saving of an almost extinct creature? Surly not the Federal Government. President Bush wants to give back the responsibilities back to the states. He should live up to his words. Act to work to save grizzly bears because they are listed under that law as a species threatened with extinction.”
- “I am appalled and disappointed that you have chosen to rescind the Selway-Bitterroot grizzly bear reintroduction program. It is not consistent with your stated views regarding local control, and is a serious blow to the future prospects of grizzly in the northern Rockies.”

- “I am writing to urge you to support the introduction of grizzly bears in the Selway-Bitterroot wilderness of Idaho and Montana. This plan is the result of efforts by environmental organizations, labor unions, and the timber industry. The citizen management plan earned broad bipartisan and public support. Your administration has claimed the voices of local citizens and the impact on them should be considered. Well, the majority of citizens in Idaho and Montana support the plan.”
- “The original EIS and ROD for grizzly restoration in the BE provided and unprecedented level of involvement of local authorities and residents in the management of the reintroduced grizzly population. This local involvement was a potentially valuable new model for implementing recovery efforts for such locally controversial species as grizzly bears. We regret the Secretary of Interior and Governor of Idaho, who have long advocated more locally friendly approaches to implementing species recovery efforts, are not allowing this new model to be tested and, if successful, applied elsewhere to help make recovery efforts more effective and less confrontational.”
- “Citizen management plans should be taken seriously. If locals are agreeing why would Federal officials think they should by inaction effectively kill the plan. Please don't cater to whatever special interests are causing you to effectively kill this proposal through inaction.”
- “The Citizen Management Plan for restoration of grizzly bears deserves much better treatment than your administration is giving it. This is a common sense collaboration of several different groups. It allows local citizens to actually make the decisions involving these animals.”
- “I am a long time conservative Republican and not a bleeding heart liberal environmentalist. One reason for my political preference is I believe in giving power to local people with minimum Federal Government interference. I believed George W. when he said he would do just exactly that. Why are you not supporting his philosophy?”
- “Quite frankly, you would be hypocritical and obviously biased if you were to use the excuse of local control to green light environmentally destructive practices while ignoring local concerns when they pointed to conservation. Please do not sacrifice your integrity on this issue.”
- “In closing, the Bush administration accused the Clinton administration of stomping on the rights of states and local communities. A lot of effort went into grizzly bear reintroduction at the local level with local input. The local input determined a plan to reintroduce the grizzly to Idaho. Now the Bush administration has become guilty of not respecting the rights of those local men and women who have worked so hard towards grizzly reintroduction. I am not surprised by the actions of the Bush

administration. An administration that won the presidency by a considerable minority of the vote. Why should this administration listen to the majority now?"

- "I can't believe after all that effort, we are getting cut off by BIG BUSH GOVERNMENT. What happen to local control? Do we use it only when the conclusion agrees with ours, or do we let it work?"

A few people commented specifically on the final rule for establishment of a nonessential experimental population of grizzly bears in the BE.

- "We also support the original proposed rule because it provided a valuable new model for incorporating local concerns. The original proposed rule provided for establishment of a Citizens' Management Committee and innovative implementation of federal responsibility through the use of experimental status of the reintroduced population. Because it provided a mechanism for local involvement and considerable local control of a federal action, we believe the original proposed rule to be an exceptionally effectual and evenhanded solution for a complex and controversial action."

One person writes they do not support the Citizen Management plan, they believe the plan was the epitome of local control. They comment that the scuttling of the plan by the Bush administration exposes their "local control" rhetoric as untrue.

- "Even though we do not support the Citizen Management Alternative we do note that the scuttling of this plan puts a lie to claims by the Bush Administration that they are for 'local control.' This plan was the epitome of local control. It appears that the Bush Administration only uses that rhetoric."

Some respondents do not support the Citizen Management plan because they do not trust the involvement of local citizens in the management of grizzly bears in the BE. They believe the Citizen Management Committee would be staffed with representative from extractive industries, who would not have the best interests of the grizzly bears in mind. They also believe the decisions made by the Committee would be trivial and uninformed, and the important decisions would be made by the management agencies.

- "No to unprecedented management authority to local citizens and industries--who are only into the extraction greed!"
- "Our point here is that the same thing would have happened to the citizens' committee that was supposed to oversee introduction of bears into Central Idaho. Regulations and requirements would have been developed and implemented without the knowledge of the committee. The committee's only decision would be which livestock allotments to close, not if they should be closed; or which areas to remove from the suitable timber base for harvest, not if they should be removed."

- “This "local" policy is nothing more than a pandering to the destructive beef, timber and mining industries. Local control is a deception to divide and conquer any meaningful conservation effort. Local control means I can't save the Arctic Wilderness.”

Local Residents who Support the No Action and Citizen Management Alternatives:

Some local residents in Idaho and Montana write that they support the selection of the “No Action” alternative, because they do not want grizzly bears reintroduced and do not trust the federal government to look after their local interests.

- “Take "no action." People first - keep bears and environmentalists in Alaska! We don't need government restrictions imposed on our state.”
- “Actual Westerners who live and work here are not in favor of the introduction and would like some attention paid to their views.”
- “The Program is Opposed by State and Local Interests...Since the cooperation of local interests is so vital to the success of any reintroduction program, and since local interests are most directly affected by the program, their concerns must be respected. This is especially true in this case, where the species to be reintroduced is a large, dangerous predator that can dramatically affect lives and livelihoods.”
- “I am in complete agreement with Interior Secretary Gale Norton's proposal to abandon grizzly recovery and to adopt instead an official position of no action. I listened closely to the fervent arguments of an NWF representative on NPR; Science Friday program on 7/13, and at the end I still had not heard an answer my questions: (1) Why recover the grizzlies? (2) Who needs the grizzlies to be recovered? (3) Will local residents feel comfortable letting their kids play outside when there are grizzlies roaming nearby? I would hazard a guess that the citizen management program is favored by local residents only because they think that the best deal they can get in the face of the environmental zealotry rampant inside the beltway. Given their druthers, the residents would probably prefer that the grizzlies stay right where they are now. Besides, has anybody considered the rights of the grizzlies? What makes anybody think they would want to move?

Some local residents in Idaho and Montana write that they support the reinstatement of the Citizen Management plan. They focus on the positive benefits of local control and involvement in decisions that will impact their lives.

- “...it's hard to imagine a better example of collaboration between local communities, industry and environmentalists on endangered species, and her action shows the hollowness of her words about supporting endangered species recovery when there is real local involvement in these important decisions. Her warm, fuzzy rhetoric

about grizzly bears in the Yellowstone and Northern Continental Divide Ecosystems in reality amounts to a firm commitment to do absolutely nothing.”

- “As a native Montanan, I think it would be wonderful to return the grizzlies to their former range in the Selway-Bitterroot Wilderness...The Citizen Management plan that would give local citizens a direct voice in managing this recovery effort is very important. This should be the preferred alternative for grizzly recovery.”

Some people comment about the abrupt proposal to abandon the Bitterroot recovery plan after years of public involvement. They think it send a message that citizen and industry involvement in the planning process is irrelevant, and will discourage citizens from participating in the future.

- “... by abandoning the recovery plan for the Selway-Bitterroot now, we are sending the message that citizen and industry involvement is irrelevant. How can we expect people to become involved in future issues when their time and input are proven meaningless and wasted in the end?”

Federal Jurisdiction versus States Rights:

Local Involvement should guide decisions grizzly bear recovery decisions:

Some respondents believe local involvement and input should guide decisions about grizzly bear recovery. People were also resentful that the federal government has so much control over their lives. They believe in the rights of states to make decisions about grizzly bear recovery activities that impact the citizens.

- [Governor Kempthorne]... “The secretary is afforded wide latitude with respect to establishing experimental populations in the hope of facilitating local acceptance and support... Idaho believes this core purpose of section 10(j) has particular significance here because the November 2000 rule represented precisely the type of agency disregard of local interests and concerns that the statute intended the Secretary to avoid. I stressed those concerns- which included human injury or death, livestock depredation and possibility of brucellosis introduction to the extent bears were taken from the Yellowstone Ecosystem population- without avail in my April 2000 letter.”
- “Why don't you let the local Montana and Idaho residents decide this issue?”
- “They say your survey results indicate that 74% of Americans favor this program. My guess is that the majority of that 74% have only seen a bear (any kind of bear) on TV and they will never be in a position to encounter one like the people living in Idaho will. It should not be their call.”

- “The locals are weighing in heavily on the side of support because they can control what happens - not big brother government which usually tends to drag things out and distort the facts.”

Grizzly Bear Recovery involves national resources, and all Americans should have equal input:

Quite a few people commented that grizzly bears and their habitat are national resources, and all Americans should have input as to how the resources are managed. They do not believe local citizens should have any greater right to influence management decisions than they, as Americans, do.

- “This concept of 'local management' is flawed. These bears are mine also even though I live in Texas. That is why we have a "United States.”
- “I believe the National lands such as the Bitterroot should be managed for the long term benefit of all the citizens of the surrounding communities, states, and the country, not just those who regard them as their private domains to be exploited for commercial gain.”
- “I do not support giving management over to "local" (which is code for business interests and others) control. These are federal lands and they should be managed with national interest in mind.”

GRIZZLY RECOVERY PLAN EFFORTS (300)

A few respondents address the Recovery Plan specifically and most of those comments pertain to the size of the recovery area. Some point to the advantages of the Selway-Bitterroot ecosystem for grizzly bear recovery. Some provide suggestions on areas to include or exclude in the Recovery Area. A few respondents disagree with diverting resources away from reintroduction efforts and toward ongoing recovery efforts in the existing ecosystems. Others feel that waiting 50 years or more for natural grizzly recovery is unsatisfactory. A few respondents feel the grizzly bears are already in the Selway-Bitterroot ecosystem.

- “In our professional opinion, we strongly believe that the reintroduction into the SBE is integral to the long-term viability of existing isolated grizzly bear populations and that this single most important action that you could take towards recovery of grizzly bears in the lower 48 contiguous states.”
- “Waiting 50 years or more for a natural grizzly population to possibly return to the BF would be waiting too long for an uncertain result. There are many factors which could in the future, completely prevent a natural population from ever even occurring.”

- “..grizzly bears will probably eventually return to this ecosystem naturally. If so, the full force of the Endangered Species Act will apply. It makes more sense to try to live with grizzly bears under the proposed citizen management plan rather than wait for their eventual return naturally.”
- “I know the Selway-Bitterroot country from personal experience. I was born in Orofino, Idaho and my family and I spent a great deal of time on the Clearwater and Selway and in the mountains above, hunting and fishing. That country is ideally suited for grizzlies. Its big and its wild and they have everything they need to survive and flourish. There is no better habitat in the lower 48. Let the grizzly recover some of its former range.”
- “The east slope of the Bitterroot Mountains is not appropriate grizzly bear habitat because of man's constant presence there, and should be removed from the recovery zone even under the No Action Alternative. The entire east slope of the Bitterroot Mountains should be managed under a zero tolerance policy for bear presence.”
- “Few wilderness areas in the 48 states can match this region's ability to support wild grizzly populations.”
- “In addition, we urge the Fish and Wildlife Service to live up to its promise to improve grizzly bear protections within and between the Greater Yellowstone, Northern Continental Divide, Cabinet-Yaak, Selkirks, and the North Cascades recovery areas. A high priority should be to protect our remaining roadless areas, linkage zones, and other areas threatened by current and future logging and energy proposals.”
- “Ecologically, it is sensible to try to put an animal which was once a part of the natural scene back into its former environment. For the species, it also makes sense that in order to improve the genetic diversity and health of the grizzly in this part of the west that reintroduction of the bear in Idaho is essential...If managed correctly, with the proper education for the public, I am sure such a recovery project will be quite successful.”
- “The NOI and statement by the Secretary of the Interior justify this change by noting grizzly recovery should be emphasized in areas where populations already exist, not in the largest wildland ecosystem in the lower 48 states. This rings false on two counts. First, grizzlies may inhabit the Big Wild already. We have submitted comments regarding sightings of grizzlies in the area and have shown how the analysis in the FEIS disregarded strong evidence in coming to its pre-determined conclusion. ...The USFWS grizzly recovery coordinator has downplayed reports of grizzly sign within & adjacent to the Big Wild which warrant serious investigation. In one instance, sighting reports from Forest Service personnel were found by citizens. Rather than accepting their existence--which should have been known to

the coordinator as the employees had properly documented the sightings--and engaging in further investigation, the coordinator cast aspersions on the citizens who asked for an explanation and castigated the Forest Service employees who made them.”

- “...recent experience sends the signal that natural recovery may not be recognized or tolerated by the government. By refusing to officially recognize any grizzlies that may wander into the ecosystem is simply another way "to prevent grizzly bears from naturally re-establishing." Any accidental deaths from black bear hunting or other mortality would go unnoticed. Any bears in the area would go unrecognized. They wouldn't be there, *ursa non grata*. It is a way to wash the agency's collective hands of its responsibility under the ESA.”
- “The recent killing of a young male bear near Superior, MT (the bear had crossed I-90 and entered the Big Wild ecosystem by apparently going under a bridge) not only provides evidence that bears use the area, it also details the unfortunate consequences of bears expanding their range--consequences in part due to the absence of a real commitment to natural grizzly recovery by the USFWS.”

Some respondents feel there are enough grizzly bears in other ecosystems in the lower 48 and energies should be focused on those populations rather than reintroducing more into the Selway-Bitterroot ecosystem.

- “Today, Montana has its share of grizzly bears in well established areas which have been available for a long time. Enough is enough. No new grizzly bear areas.”

A few respondents provide suggestions on what the priorities of the Grizzly Bear Recovery Plan should be.

- “Priorities for grizzly bear recovery in the lower 48 should be : 1) reducing mortality in the Yellowstone and northern continental divide ecosystem and 2) getting more places to ensure long term chances of species survival.”

MANAGEMENT OF GRIZZLIES ON PUBLIC LANDS (301)

Most of the comments pertaining to this category are found in code 506. The comments specific to the recovery plan relate to the Nez Perce tribe managing the recovery of grizzly bears.

- “U.S. Fish and Wildlife Service should explore the option of the Nez Perce tribe managing recovery of the grizzlies, as they have done successfully for the gray wolf.”

- “The Tribe maintains active management interests in the natural resources that lie within our treaty lands, which include the grizzly bear recovery area in the Bitterroot Ecosystem. The Tribe fully supports the U.S. Fish and Wildlife Service (FWS) efforts to recover the grizzly while ensuring adequate local participation in the management of the species. As such, the Tribe pursued, and continues to pursue, an active management role in the recovery of the grizzly bear for both the ecological benefits of returning the bear to its rightful place and the cultural benefits recovery would provide to the Nez Perce people.”

GENETIC RESEARCH (302)

The FWS believes that addressing identified recovery needs in the ecosystem that already contain grizzly bears is a high priority. An example is the ongoing genetic studies for population size estimation in the Northern Continental Divide Ecosystem. Comments relating to the ongoing genetic studies are:

- “Scientists are now better prepared to evaluate the bear's population status with the availability of new technology such as DNA analysis coupled with better sampling techniques (hair grabbers, etc.).”
- “The Yellowstone population has been cut off from other grizzlies for the past 80 years. Recent studies conducted at the University of Idaho under Professor Lisette Waits, a leading bear geneticist, show that this diversity loss in the Yellowstone population is continuing. Reintroduction of grizzlies in the Bitterroots would be a big step toward reversing this trend.”

POPULATION MONITORING (303)

Most of the comments pertaining to population monitoring are included in the summary for codes 403 and 407. However, one respondent refers to the recovery plan itself.

- “Scientists are now better prepared to evaluate the bear's population status with the availability of new technology such as DNA analysis coupled with better sampling techniques (hair grabbers, etc.).”

PUBLIC EDUCATION (304)

Several respondents are supportive of public education in the grizzly bear recovery plan. They feel public education helps people learn strategies to reduce the risk of

confrontations with grizzly bears, and help educate people on the benefits of the reintroduction effort. A couple people offer specific suggestions for more public education.

- “With more education the general public will, we are sure, overwhelmingly support the reintroduction of this magnificent animal.”
- “With proper education, and willingness to set up a program to compensate the local population for bear inflicted losses to livestock, the reintroduction should work. Ask yourself this- How can millions of people camp and hike through Yellowstone every year, in an area that supports approximately 400-600 grizzlies, and have the bear encounters so minimal? It's in part, because visitors are educated to reduce the risk of bear encounters.”
- “Living with grizzlies in the wilderness only takes following the standards for hiking and camping that should be used by every one anyway--keeping a clean camp and taking common sense precautions.”
- “I assume much of the opposition to the reintroduction comes from hunters, hikers, ranchers, and others who don't truly understand these great animals. I think the answer is education. Rather than trying to force this issue on the people of Idaho, you should focus your efforts on informing the public.”
- “Conflicts between wildlife and humans are a way of life. Public education and awareness of potential conflicts and a desire by the public to avoid the conflicts is the solution to those problems, not the exclusion of conflicting wildlife forms from an ecosystem.”
- “We refer you to the Missoulian editorial of a few weeks ago, lamenting the lack of enthusiasm by some Idaho residents for grizzly bears. Clearly, rural people in Canada and Alaska routinely deal with grizzlies; a key is education of how to live in grizzly occupied country. Such an education would likely improve the ability of Idahoans to live with many other forms of wildlife.”
- “Wildlife officials in British Columbia have made the NCE a priority grizzly recovery zone, initiated the recovery process and proposed relocating 25 bears to the Canadian side of the NCE over the next five years. The North Cascades subcommittee of the Interagency Grizzly Bear Committee has unanimously endorsed a funding request for an Information and Education program and a recovery EIS. Groups such as Northwest Ecosystem Alliance and Defenders of Wildlife have pledged financial and logistical support to facilitate grizzly recovery. The aforementioned and others, in cooperation with state and federal wildlife agencies, have conducted a very successful program called Living with Carnivores for the past two years to educate people around the state about human behavior and the role of carnivores in these ecosystems.”

- “I am a wildlife biology student at the University of Montana. I have taken an interest in bears, of all kinds, since beginning the wildlife program. I have also had the opportunity to talk to a few residents of the Bitterroot area. A lot of them are afraid and concerned about many aspects of the reintroduction. ...The citizens management plan gives the public a hand on an issue that they feel very strongly about. If we do not work with the public we will not accomplish our goals. I believe that there needs to be more open talks and possibly some more speakers from areas that have grizzlies. Such as, Alaska, the Swan Valley in Montana, these people that live and have ranches and families in areas that are abundant or at least maintain current populations of grizzlies.”
- “I am especially interested in changes to the 'rules of engagement' between bears and people and restrictions to public access. I believe that some adjustments could be positive for both bears and people. More public awareness of bear behavior and discussion of reasonable responses by the public would be very helpful.”

IMPLEMENTING RECOVERY PLANS FOR EACH POPULATION (305)

Comments pertaining to this issue are included with those for code 407.

ECOLOGICAL BALANCE (306)

A vast majority of comments on this issue express a belief that the grizzly bear is a missing component of the Bitterroot Ecosystem and will help keep nature in balance. They feel the grizzly bear will enhance their wilderness experience by restoring the top predator of the food chain. Some feel it is mankind's responsibility to return the grizzly bear to the Bitterroot Ecosystem because man caused its eradication.

- “Enough long term scientifically studies have been completed demonstrating the grizzly is not the rampaging flesh eating monster the opposition likes to portray. Coexisting with the grizzly may not be easy but it can and must be done to restore a ecologically sound environment.”
- “In Kansas, we have an abundance of deer and am desperately in need of the predator population. Without predators such as grizzlies, the balance of the ecosystem is lost.”
- “Even though it will not bring back the original 50,000 grizzlies and restore 98% of their original habitat, it will help right terrible wrongs to them that humans made in the past. Furthermore, by restoring grizzlies to the Bitterroot region they will make it a healthier ecosystem since they are a keystone species.”

- “Restoring them (Grizzly Bears) to their place in the web of life in the Bitterroots will help restore the balance in that ecosystem.”
- “We must acknowledge that it is our own impending development on the Grizzly that puts them in such danger and a no action proposal doesn't adequately protect the grizzly earthly rights to co-exist with us.”
- “I am a firm believer that we need to gain back the natural order of nature in the wild in places where there is enough room. There certainly is enough room in the Bitterroot ecosystem to support grizzlies. The correlation between grizzlies and the wolves that are already there would be very beneficial to each entity.”
- “From an ecological standpoint, the mere presence of bears as a keystone species is critical to a healthy ecosystem. Just as the other dominant predators, the grizzly bear is necessary to maintain a natural predator/prey relationship in our forests.”
- “Restoring grizzly bears to Idaho is too important to be sacrificed for political reasons. These great animals are a necessary check in a very delicately balanced ecosystem.”
- “The bear specialists group (BSG) is one of the specialist groups founded under the auspices of the World Conservation Union (IUCN). The United States is viewed as the world's leading nation in democracy, wealth and influence. We believe that the United States must also take a leading role in ecological conservation. Reintroducing grizzly bears into the Bitterroot Ecosystem would have set an important international standard for restoring and maintaining the integrity of ecosystems.”
- “Grizzly Bears are an umbrella species and protection of this species will in turn protect so many other species underneath the grizzly bears. ...we MUST focus on protection and improvement of key habitats and linkage corridors that will allow them to naturally travel into the proposed recovery area and survive once they get here.”
- “We need Grizzlies returned to enhance biodiversity and biological balance. What good are wildlands with overpopulated deer, squirrels, raccoons, chipmunks and scavengers.”
- “I am a 13 year old in Ohio and I strongly urge you not to stop the reintroduction of grizzlies to the Bitterroot-Selway wilderness. I really care about the wildlife, and if you save some grizzly bears, you will be saving many other animals and plants too. It is a big chain.”

Several people believe the grizzly bear is not native to the Bitterroot Ecosystem. They say the grizzly bears would be there now if they were meant to be there. Others feel the grizzly bears would not improve the ecosystem. Some feel there are enough predators in the ecosystem now. Others just don't want them there.

- “Environmental groups argue the bear must be introduced to restore the Bitterroot ecosystem to fully functioning condition. This is nonsense. The Bitterroot Mountains are fully functioning ecosystem without the grizzly bear. There is no nutrient, hydrologic, biological or functional piece of the puzzle missing because the bear is not present. Adding the bear, therefore, only creates serious danger for humans while doing little for the ecosystem. Families would otherwise use and enjoy the area in the absence of the grizzly bear, would think twice about subjecting their children to this kind of threat. We believe introducing that kind of threat is a mistake.”
- “The Bitterroot Mountains are a fully functioning ecosystem without the grizzly bear.”
- “The reintroduction is not likely to restore the "natural ecological balance." The "balance" of any given area is in constant flux. Wildlife biologists have demonstrated that large predators destabilize prey populations if anything. It is clear to me that it will change the present predator/prey relationships as has done in Yellowstone.”

Relating to the recovery plan itself, some respondents feel interconnection between the various ecosystems is crucial to regaining and keeping healthy and diverse populations of grizzly bears.

- “Our natural heritage in the West is one of the roadless wilderness containing a full complement of wildlife, including ALL predator species. Without these predators, the ecosystem does not have its natural balance. Interconnection between wilderness areas is also crucial to regaining and keeping healthy and diverse populations of these animals.”
- “Being a critical missing link in the ecosystem of our forests and classified as endangered under the ESA makes it our nation's duty to protect and reintroduce these animals to the few remaining lands that can support their survival, such as those in ID.”
- “The Plan, which provided for a slow reintroduction of grizzly bears into the Bitterroot Mountains in Idaho and Montana, overseen by a Governor-chosen committee, was without a doubt the best chance the grizzlies had at a healthy comeback in the United States. The remote, lush wilderness provided a balanced ecosystem in which the bears could adjust, multiply, and thrive with minimal

chance of human contact. The Plan is the first step in restoring grizzly bear habitat in the contiguous 48 states.”

IMPORTANCE OF BITTERROOT RESTORATION TO GRIZZLY BEAR RECOVERY (307)

Some people comment that the BE was included in the Grizzly Bear Recovery Plan. The BE was designated as a recovery area in the Grizzly Bear Recovery Plan for numerous reasons. Some of these include the fact that it was historically occupied by grizzly bears, it still provides adequate habitat to recover the species, and it offers excellent potential to recover a population of bears with minimal impacts to humans due to the large size of the area and its remoteness.

- “The Bitterroot Ecosystem is a designated recovery area in the Grizzly Bear Recovery Plan because grizzly bears historically occurred there and the remote and vast area still provides excellent habitat and potential to recover a healthy population and significantly contribute to the recovery of the species.”
- “This project holds the key to the long-term survival of grizzlies in the lower 48 states...This 15-million-acres is the best place for recovery and there is very little potential for conflict with humans or livestock.”
- “The 1993 grizzly bear recovery plan includes the Selway-Bitterroot ecosystem as one of the crucial recovery zones required to have a viable population of bears to sustain a long term recovery.”
- “The Federal Register Notice states that the Service has higher recovery priorities than reintroduction to the Bitterroot Ecosystem and implies that Bitterroot restoration is not essential to recovery of the species. We strongly disagree. ... While Northern Continental Divide and Yellowstone Ecosystems are important areas where the Service has conducted important conservation work over the last twenty years, much of that work is now complete. But only slightly more than a thousand bears in these populations, the numbers are clearly too low to constitute recovery. Therefore, it is appropriate for the Service to turn its attention to the area in the lower 48 that has the highest likelihood for restoration of a sizeable population.”

Many respondents discuss the attributes of the BE for recovering a robust grizzly bear population. They mainly discuss the ample habitat available for grizzlies in the BE. Many describe it as the last best place to restore a healthy grizzly bear population in the lower 48 States.

- “I found the Montana Idaho border to be one of the most pristine areas. While visiting there I saw few humans and signs of settlement. For these reasons I believe the Selway is perfect for reintroduction.”
- “The Bitterroot area is the last as well as the best place for bear recovery with excellent habitat over millions of acres of wilderness.”
- “This area has millions of acres of designated wilderness which have little potential for conflict with humans or livestock. Grizzlies need, as you know, hundreds of miles around them to thrive. This would, in fact, be one of the best areas in the lower 48 states to insure recovery of these magnificent animals.”
- “What a big area it is! has the complainers looked at the size of the land where we are talking about? The Selway Bitterroot area is about 15 million acres! We are talking about land the size of the state of Connecticut, with a great abundance of bear habitat and very few opportunities with humans.”
- “I’ve spent a lot of time flying over, working in, and hiking around this wild country, and have a good feel for how big it is and how appropriate as grizzly bear habitat.”
- “As a biologist and former resident of both Montana and Idaho, I have spent many days wandering in this region. There is no better vacant bear habitat left in the lower 48 states than the Selway country.”
- “I am very familiar with this area and know that the bitterroot ecosystem has millions of acres of designated wilderness offering an abundance of food for bears and minimal chances for conflicts between bears and people.”
- “I formerly worked as a wilderness ranger in Central Idaho. The Bitterroot-Selway wilderness is one of the few places where grizzlies have a chance, and it also will connect the Glacier-Cabinet populations, with the Yellowstone population, currently isolated. Some gene flow must take place, if the grizzlies are to make it in the Rocky Mountain West.”

Many people comment on the importance of restoring a population of grizzly bears in the BE to the overall species recovery efforts in the lower 48 States. Some comments are general and include many benefits from a new population, while others focus on specific benefits.

- “All bear species have been significantly reduced in numbers and distribution due to expanding human population and developments. In North America, the grizzly bear once live so far south as Mexico, but now occupies less than 2% of it’s original range south of Canada. This is an unacceptably small percentage given that there are large areas of formerly occupied habitat that are both biologically and socially

suitable locations for restoration efforts. Of these currently unoccupied habitats, the wilderness area in the BE is the most appropriate place to restore grizzly bears. This area is remote, is primarily designated wilderness, is sufficiently large and intact to support a viable population, and the potential for significant conflict with other uses such as livestock grazing is very small. We are aware of nowhere else in the world where there is a better opportunity to reestablish significant population of grizzly bears.”

- “Craighead et al. (1995) outlined goals to achieve population recovery for grizzlies in the lower 48. They believed much more extensive areas need to be ascribed for recovery with greater connectivity among them in order to reduce from maternal home ranges through relatively "friendly" habitat in the Yellowstone ecosystem (Blanchard and Knight 1991). Populations isolated by these or greater distances in less friendly habitat will remain isolated (Mattson et al 1996). Movement depends upon the establishment and survival of adult females in the additional intervening habitats, which would function as a sequence of demographic stepping-stones. Connectivity depends on establishing populations and creating habits in these areas where females can survive (Mattson et al. 1996). The distance between each of the 3 large grizzly cores in the northern Rockies (Yellowstone, BE, and northern continental divide) is less than 300km.”
- “I'm a biologist who has worked and recreated in Grizzly Bear habitat for more than 20 years. I've studied conservation biology and the problems that the Grizzly Bear faces in the American West. In my opinion, the long-term viability of the Grizzly Bear is severely compromised unless two key things happen: 1. Viable populations of the Bears are restored to Central Idaho and Western Montana, and also to the Cabinet-Yaak, the Selkirks, and the North Cascade recovery areas; 2. Migration corridors are maintained between these populations, to allow dispersal of juvenile bears, gene-pool transfer, and re-establishment from other areas if one population is hurt by environmental factors.”

A few respondents discuss the issue of the Bitterroot population being integral to maintaining and improving the viability of existing populations in the Northwest. Because the BE is centrally located between four existing populations, it would provide a potential link and movement corridor between existing populations. Also the addition of a third robust population of grizzlies in the lower 48 States would also improve viability and health of the other populations. Potential genetic interchange between populations resulting from the centrally located Bitterroot population would protect the other populations from inbreeding depression.

- “Restoring grizzlies to the Bitterroot Ecosystem will help ensure the health and survival of grizzly bears in the lower 48 states where they currently occupy less than 2 percent of their original habitat.”

- “The Wildlife Society believes that the reintroduction of grizzly bears into the Selway-Bitterroot Wilderness area is integral to maintaining the viability of existing populations. Currently, there are only two viable grizzly bear populations in the contiguous 48 states. These populations are small and isolated from one another, making them vulnerable to extinction, and there is a lack of dispersal corridors connection them due to human development and sprawl. The FEIS for grizzly recovery presented sound evidence that the addition of a population to the Bitterroot ecosystem would provide a potential link between existing populations and increase the probability of movements between them.”
- “The Bitterroot Ecosystem is situated geographically in a key position to permit the movement of bears and grizzly bear genes among 4 of the 5 currently isolated populations south of Canada. The extremely small grizzly bear populations in northwestern Montana and northern Idaho (each with only 30-50 bears) have been found to be warranted to be listed as "endangered," although still listed as threatened." These are the closest populations to the Bitterroots and their likelihood of persistence would be greatly enhanced by establishment of connections to a larger restored population in the Bitterroots.”
- “A significant feature of the SBE is it's geographic location. It is located centrally between all five remaining fragmented populations of grizzly bears, and would therefore provide connectivity between these populations. This feature is critical for allowing dispersal and emigration/immigration of grizzly bears which insures gene flow between populations and hence, increased chances for long term survival. The finding that isolated populations are far more vulnerable to extinction than connected populations is well-known and accepted in conservation plan is so important.”
- “The Craighead wildlife wildlands institute depicts a GIS model of the best Grizzly Bear migration corridors between the Salmon-Selway and other Northern Rockies ecosystem. The map of the preferred corridors depicts the essential role of the Bitterroot in providing a habitat network throughout the Northern Rockies sufficient for long term maintenance of viability of grizzly bears.”
- “The extremely small grizzly bear populations in the northwestern Montana and northern Idaho (each with only 30-50 bears) have been found to be warranted to be listed as "endangered" although still listed as "threatened." These are the closest populations to the Bitterroots and their likelihood of persistence would be greatly enhanced by establishment of connections to a larger restored population in the Bitterroots.”
- “Appendix 21C. Metapopulation Analysis for the Bitterroot Population, authored by Dr. Mark Boyce, shows quite clearly that addition of a Bitterroot population, linked with other populations in a metapopulation structure, dramatically lowers probability of extinction of grizzly bears in the contiguous 48 states... Since

recovery of the grizzly bear within the Bitterroot Recovery Area, has been directly linked to the recovery and survival and recovery prospects of grizzly bear, a listed species. This, the proposed action is term survival and recovery prospects of the grizzly bear, a listed species. Thus the proposed action is essential to the long-term survival and recovery of the grizzly bear in the contiguous U.S. states.”

- “Bitterroots are critical to grizzly recovery. Grizzly populations in other recovery areas are isolated. Recent studies show that grizzlies in the Greater Yellowstone Ecosystem, which appear to be the closest of any population to recovery, suffer from a loss in genetic diversity due to inbreeding. Isolated populations are vulnerable to many threats, but loss of genetic diversity through inbreeding may be the worst. One of the most important ways to help existing populations is to link them, and that is via the Bitterroots. No action in the Bitterroots delays recovery elsewhere.”
- “Without the reintroduction of grizzlies into the Bitterroot ecosystem, it will have a serious impact on the viability and sustainability of grizzly bear populations throughout numerous other regions including Yellowstone National Park.”

A few comments have a different opinion as to the importance of restoring a grizzly bear population in the BE. They question the ability of the BE to serve as a link to other existing populations, and also question the potential for inbreeding depression in the Yellowstone population if new bears do not migrate there and interbreed with the population.

- [Governor Kemthorne]...“The FWS admits that establishing a grizzly population in the BE would not ensure connectivity among the current populations and that, conversely, the failure to successfully establish the experimental population would not appreciably diminish the survival probabilities of bears in the currently occupied systems.”
- [Governor Kempthorne]...“The Yellowstone population has been isolated for 60 to 80 years (FWS 1993) and is about 15 percent less genetically diverse than grizzlies in Glacier National Park (Billings Gazette 2001). Dr. Servheen recently predicted that the Yellowstone grizzlies have only 30-40 years before reaching a genetic bottleneck that threatens the bears existence (Casper Star Tribune 2001). He further contends that the establishment of the BE population will enhance the genetic diversity of both the Yellowstone population and several other isolated grizzly bear populations in the lower 48 states. Idaho disagrees and believes that the establishment of a nonessential experimental grizzly population in the BE will only add one more genetically isolated population to the scenario and create additional genetic management problems for the FWS instead of solving current ones. The distance from the BE to Yellowstone is almost the same as from Yellowstone to the Northern Continental Divide Ecosystem. Since bear movements between the Yellowstone and Continental Divide populations do not occur, it is unreasonable to

assume that movements between the Yellowstone and BE populations will take place if a grizzly population were to be established in the BE. The FEIS also predicts that it will require 50 to 110 years for the BE population to reach recovery levels where bears would begin to disperse. Thus, the only rational and workable option for sustaining genetic diversity among the dwindling grizzly bear populations in the lower 48 states in augmentation through other means (Ruediger 1989, Mann and Plummer 1995).”

EFFECTS ON GRIZZLIES (400)

People are concerned the grizzly bear in the lower 48 states will suffer a genetic bottle-neck. Many support the reintroduction of the grizzly bear into the Bitterroot Ecosystem and managing the corridors between ecosystems to help elevate the threat of inbreeding. Many respondents support the previous Alternative 4 because it encourages the development of linkage corridors. They are also adamant that the proposal for “no action” will negatively affect the grizzly bears. A particular area of concern is the Yellowstone population because of its small size and isolation. They claim the presence of grizzly bears in the Bitterroot Ecosystem offers the possibility for natural dispersal and connectivity with the northern populations.

- “Revive and reinstate the reintroduction plan of grizzly bears into the Bitterroots now. It is an important ecosystem and would be a major help to broaden the gene pool and habitat of the great grizzly bear in the future, and also will help to connect the "islands" of habitat that now exist.”
- “Do not abandon grizzly bear recovery programs that would reintroduce bears into key habitat in Idaho. In spite of the ill informed objections of the Idaho congressional delegation and Governor's Office, the plan of re-introducing bears into available Idaho habitat is sound.”
- “Just the word "grizzly" engenders fear in many of us. The idea will be to "get them before they get us", and many people will be armed with guns powerful enough to kill grizzlies. And, along with grizzly bears, anything that looks like a great big bear will be shot. Too bad for the black bears, moose and whatever else gets in the sights of a citizen "loaded for bear".”
- “I'm a biologist who has worked and recreated in Grizzly Bear habitat for more than 20 years. I've studied conservation biology and the problems that the Grizzly Bear faces in the American West. In my opinion, the long-term viability of the Grizzly Bear is severely compromised unless two key things happen: 1) Viable populations of the Bears are restored to Central Idaho and Western Montana, and also to the Cabinet-Yaak, the Selkirks, and the North Cascade allow dispersal of juvenile bears,

gene-pool transfer, and re-establishment from other areas if one population is hurt by environmental factors.”

A handful of respondents are concerned that the whole grizzly bear reintroduction effort will have a detrimental effect on grizzly bears. Most of these people feel the grizzly bears will be killed because of their contact with humans, livestock, and private lands in the Bitterroot Ecosystem.

- "I do not want the grizzly reintroduced here. It isn't fair to the grizzly, the people who live here, their livestock, or to the resident black bears. The grizzly disappeared from here because people killed them. If reintroduced they will disappear again because people will kill them. How is that helping the grizzly?"
- “The grizzly bear is a magnificent animal and in my opinion it deserves better than being forcefully reintroduced to an area that is too close to people - people that definitely do not want them here.”

CONNECTIVITY/ POPULATION CORRIDOR LINKAGES (401)

Many respondents are concerned that “no action” will eliminate the possibility of connectivity and population corridor linkages. These respondents feel the Bitterroot ecosystem is one of the largest contiguous blocks of Federal land remaining in the lower 48 states. They see the BE as important to grizzly recovery because it provides a linkage between other isolated grizzly bear populations. Many respondents feel the future of the grizzly bear as a species hinges on connecting populations for genetic diversity. They cite several scientists who support this contention such as Servheen, Craighead, Blanchard, Knight, Mattson, etc. Advocates of the previous alternative four are particularly adamant about the need for linkage corridors.

- “The populations in the Yellowstone and Glacier National Park regions are too isolated and don't provide enough space to ensure the long-term viability of grizzlies. The Northern Continental Divide population is less than 30 bears so that cannot be considered a stable population.”
- “Even if the Governor doesn't know about the Bitterroot's position as a key link in establishing the corridor from Canada down to Yellowstone's "island" population of grizzlies-and linking up with the Cabinet-Yaak and NCDE populations, thousands of Idaho conservationists like me do know.”
- “This wild landscape is critical for Grizzly Bear recovery efforts because it provides the keystone in an ecological bridge between isolated populations within the United States and Canada. The potential for connecting these areas was affirmed with the recent travels of a Grizzly from northwestern Montana south of Interstate 90

and the Clark Fork River, evidence that Grizzlies can get to Idaho from outside populations, and probably some have already.”

- “Set a high priority to protect our remaining road less areas, linkage zones for access and for wild life, and other areas threatened by the current administration's exploitive energy and logging proposals.”
- “U.S. Fish and Wildlife Grizzly Bear Recovery Coordinator Chris Servheen, a leading scientist in the field, has stated that the health of wildlife population's, especially large carnivores, in the northern Rockies is critically dependent upon their ability to move from place to place. His expertise recognizes that if we do not address linkage issues, then grizzly bears will become island populations while their conservation success and future will dramatically drop off. These scientific facts must be considered and incorporated in any recovery plans for grizzly bears.”
- “Craighead et al. (1995) outlined goals to achieve population recovery for grizzlies in the lower 48. They believe much more extensive areas need to be ascribed for recovery with greater connectivity among them in order to reduce from maternal home ranges through relatively "friendly" habitat in the Yellowstone Ecosystem (Blanchard and Knight 1991). Populations isolated by these or great distances in less friendly habitat will remain isolated (Mattson et al 1996). Movement depends upon the establishment and survival of adult females in the additional intervening habitats, which would function as a sequence of demographic stepping stones. Connectivity depends on establishing populations and creating habitats in these areas where females can survive (Mattson et al. 1996). The distance between each of the 3 large grizzly cores in the northern Rockies (Yellowstone, BE, and northern continental divide) is less than 300km. The key for connectivity and the priority for management that ensures long term persistence of bears then is reintroduction of bears into the BE.”
- “A high priority should be to protect our remaining roadless areas, linkage zones, and other areas threatened by the Administration's energy and logging proposals.”
- “It is imperative that the Service follow the advice of Chris Servheen in establishing and protecting linkages which will serve to enhance and truly recover grizzly populations in the Northern Rockies.”
- “From a point of science, we need all species represented to sustain a balanced, healthy and complete ecosystem. Following a methodical and lengthy public process, the U.S. Fish and Wildlife Service agreed that Idaho contains the habitat needed to support grizzly bear recovery, a species designated as "threatened" under the Endangered Species Act. This habitat is critical to a recovery plan because it would provide a "link" or "corridor" between isolated grizzly populations in the United States and Canada.”

- “The Selway-Bitterroot ecosystem is a perfect environment for a grizzly population. The re-introduction of grizzlies into this area would help to remedy the "island population" dilemma and encourage gene diversity and long term success of re-establishing the grizzly in its ancestral homeland.”
- “Habitat fragmentation may result in smaller and more isolated wildlife populations, particularly for species such as Grizzly bears with demanding habitat needs. Smaller populations are more vulnerable to local extinction, due to stochastic events. (Shaffer 1978, Gilpin and Soule 1986). Smaller populations are also more susceptible to the negative effects of inbreeding depletion. Hence, maintaining landscape connectivity is essential to allowing for the replenishing of populations and expansion of gene pool (Noss 1983,1987,1992, Noss and Harris 1986, Craighead *et al* 1997, Craighead and Byse 1995, Paetkau *et al* 1997, Beir 1993).”
- “The potential for connecting these areas was affirmed with the recent travels of a grizzly from northwestern Montana, south of Interstate 90 and the Clark Fork River, evidence that grizzlies can get to Idaho from outside populations, and probably some have already.”
- “Finally, I urge FWS to live up to its promise to improve grizzly bear protections within and between the Greater Yellowstone, Northern Continental Divide, Cabinet-Yaak, Selkirks and North Cascades recovery areas. If the grizzly population is ever going to be self-sustaining in the long term, they need to inhabit all these areas, along with the Greater Salmon-Selway ecosystems, and be able to move freely between them. Please place high priority on protecting our remaining road less areas and linkage zones which are threatened by the administration's energy and logging proposals.”
- “Creating a corridor (through Idaho) for the grizzlies in the lower 48 is of utmost importance, certainly more important than politics!!”
- “The best science has been known for years and the Service refuses to prioritize Grizzly recovery. Bears need space and connectivity, yet the Service has done nothing to remedy the shrinking island habitat available to large mammals.”
- “If the Department of Interior is truly concerned with grizzly bear populations they should look to the tremendous benefit of an additional subpopulation and the increased connectivity within the metapopulation. Given the effort already put forth with the reintroduction, the perfect suitability of the area, and the benefits to the existing population, I believe this current decision is completely irresponsible.”
- “I formerly worked as a wilderness ranger in Central Idaho. The Bitterroot-Selway wilderness is one of the few places where grizzlies have a chance, and it also will connect the Glacier-Cabinet populations, with the Yellowstone population, currently

isolated. Some gene flow must take place, if the grizzlies are to make it in the Rocky Mountain West.”

- “Also, it is important we preserve the gene pool of these grizzlies, with the hope of some day having a wildlife corridor from Yellowstone to Yukon so that their species may thrive. Grizzlies are a keystone species, an integral part of the forest ecosystem, and an intrinsic being. Please, if you have a heart of any kind, bring the bears back!”
- “Alternative 4 links the Big Wild and the Cabinet Mountains with habitat linkage corridors and also begins an immediate study of potential linkage corridors between the Yellowstone and Glacier/Bob Marshall areas. It is the only alternative which includes linkage corridors.”

A few respondents feel corridor linkages are unnecessary or that the linkages already exist. They point out that the objective of genetic diversity can occur with trapping and relocating grizzlies to the isolated populations. Some also feel the real objective for grizzly bear reintroduction is to exclude human activity in the area.

- “If this area is such good grizzly bear habitat, then they will migrate from one of the adjacent populations without outside intervention.”
- “The idea of the linkage zones is a nice and tidy concept, but in reality will never happen. It is a known fact that gene transfer between bear populations need only occur rarely to sustain viability of populations. This can realistically be accomplished by trapping and moving bears once and awhile between regions.”
- “We believe some people want to see the grizzly bear introduced into the Bitterroot Mountains so they can then argue for a "corridor" between Yellowstone and the Bitterroots. These people understand full well that the bear will not use the corridor as a "racetrack" between the two areas. Corridors only work if bears slowly utilize them and work toward each other. Slow colonization is only possible if the same restrictions apply inside the corridor that now occur in the recovery area. In effect, little or no human use.”
- “More room for the bear, less for humans. We suspect exclusion of human activity is the real objective of these groups, not concern for the bear. We oppose corridors for this reason.”

Idaho’s Governor Kempthorne believes that the establishment of a nonessential experimental grizzly population in the BE will only add one more genetically isolated population to the scenario and create additional genetic management problems for the FWS instead of solving current ones. Governor Kempthorne claims the only rational and workable option for sustaining genetic diversity among the existing grizzly bear populations in the lower 48 states is augmentation through other means.

- [Governor Kempthorne's Letter]...“The FWS admits that establishing a grizzly population in the BE would not ensure connectivity among the current populations and that, conversely, the failure to successfully establish the experimental population would not appreciably diminish the survival probabilities of bears in the currently occupied systems.”
- [Governor Kempthorne's Letter]...“In view of the current lack of immigration corridors and monies for their development, it is understandable that no verifiable evidence of a grizzly population has been found in the BE, even though the northern boundary lies less than 45 miles from occupied grizzly habitat in the Northern Continental Divide Ecosystem and the Cabinet-Yaak Ecosystem. The fact that grizzly bears have failed to establish a population in the BE, while protected populations occur less than 45 miles away in the Northern Continental Divide and Cabinet-Yaak Ecosystems, leads us to question how they could be expected to traverse the 240 miles between Yellowstone and the BE without a connection corridor... The facts simply do not indicate that establishment of the BE grizzly bear population would improve immigration between it and the Yellowstone and Northern Continental Divide populations. Moreover, if linkage corridors could be developed, the bears would still be required to migrate across at least one interstate highway when moving between these populations. There is nonetheless little evidence to show that grizzly bears will cross interstate highways, even where wildlife overpasses have been constructed (Chadwick 2001).”
- [Governor Kempthorne's Letter]...” The Yellowstone population has been (2001). Dr. Servheen recently predicted that the Yellowstone grizzlies have only 30-40 years before reaching a genetic bottleneck that threatens the genetically diverse than grizzlies in Glacier National Park (Billings Gazette bears existence (Casper Star Tribune 2001). He further contends that the establishment of the BE population will enhance the genetic diversity of both the Yellowstone population and several other isolated grizzly bear populations in the lower 48 states. Idaho disagrees and believes that the establishment of a nonessential experimental grizzly population in the BE will only add one more genetically isolated for 60 to 80 years (FWS 1993) and is about 15 percent less population to the scenario and create additional genetic management problems for the FWS instead of solving current ones. The distance from the BE to Yellowstone is almost the same as from Yellowstone to the Northern Continental Divide Ecosystem. Since bear movements between the Yellowstone and Continental Divide populations do not occur, it is unreasonable to assume that movements between the Yellowstone and BE populations will take place if a grizzly population were to be established in the BE. The FEIS also predicts that it will require 50 to 110 years for the BE population to reach recovery levels where bears would begin to disperse. Thus, the only rational and workable option for sustaining genetic diversity among

the existing grizzly bear populations in the lower 48 states is augmentation through other means (Ruediger 1989, Mann and Plummer 1995)."

GENETIC DIVERSITY (402)

People are concerned about the survival of the grizzly bears in isolated pockets because these populations lack genetic diversity. Many support the reintroduction of the grizzly bear into the Bitterroot Ecosystem and linking the corridors between the various ecosystems to help alleviate the threat of inbreeding. For these reasons respondents oppose the "no action" alternative while many support the previous alternative 4 because it encourages the development of linkage corridors leading to a better gene pool.

- "...those who have studied the genetics of the grizzly say it will be necessary in the long run to maintain a healthy population, by allowing bears to travel from and to areas such as Glacier and Yellowstone Parks. That makes sense, just as humans who inbreed with close relatives, produce inferior offspring."
- "This makes recovery of the species in the BE even more critical. This reintroduction/augmentation is critical to ensure an infusion of new genetic material into a potentially extant population of grizzlies in the BE."
- "It is our opinion that the largest single step that could be taken to recover grizzly bears south of Canada would be to reestablish another significant viable population in the Bitterroots."
- "Short term isolated "preserves" do not allow diversity in the gene pool required for species survival."
- "Restoring grizzlies to the Selway-Bitterroot will help ensure the health and survival of the species itself, from a genetic standpoint. Because the grizzly bear is a threatened species, we must work to protect its population: it's the law."
- "The Selway-Bitterroot ecosystem is a perfect environment for a grizzly population. The re-introduction of grizzlies into this area would help to remedy the "island population" dilemma and encourage gene diversity and long term success of re-establishing the grizzly in its ancestral homeland."
- "...additional grizzlies would improve the genetic vitality of this population. The thought of a viable population of grizzlies in the Selway-Bitterroot Wilderness is exciting."
- "The Bitterroot Wilderness can provide both a significant population to protect genetic diversity and provide a bridge between existing populations."

- “There needs to be a means for genetic interchange between the isolated bear populations in the lower 48 and this is the only feasible way of accomplishing this goal.”
- “Having a population of grizzlies between the Greater Yellowstone and Northern Continental Divide Ecosystems is essential for genetic exchange between the bears. Scientific data strongly supports the need for genetic diversity in order for any species to thrive.”
- “Montana has the "lion's share" of grizzlies but there is too much isolation and the populations cannot mix. This will eventually destroy the gene pool and these small populations will not survive.”
- “I urge you to support full grizzly bear protection in Idaho to compliment the bears full recovery and genetic diversity in the Greater Yellowstone ecosystem.”
- “I also urge the Fish and Wildlife Service to answer the call of its mission and the law as it now stands to be a force in the reintroduction of the grizzly in this area and to work toward implementation of the conservation biology initiative on the table that would link viable wildlife corridors and critical habitat to ensure strong genetic diversity of possible existing populations of bears as well as work to reintroduce new bears into the region.”
- “Without restoration in this area, pockets of grizzlies would, in effect, end up interbreeding in other areas where they are isolated from each other. ... Please do not let this be a political decision that will harm the grizzly gene pool.”
- [Nez Perce Tribe]... “The Decision to Select the No Action Alternative Ignores the Best Available Science... More importantly, the Bitterroot provides the necessary bridge to link Yellowstone grizzly bears with populations to the north. Absent the reintroduction of the 25 bears, the grizzlies in Yellowstone will remain in genetic isolation. If new genes are not introduced within three to four generations, the bears could suffer from inbreeding, posing a serious threat of irreparable harm to the species within a few decades. The bears in Yellowstone are currently less genetically diverse than those in Montana's Northern Rockies and in Canada.”
- “As a conservation biologist, I know the importance of having several viable populations of grizzlies to insure their long-term survival.

Many respondents take a different viewpoint on the genetic diversity issue. These people claim the objective for genetic diversity in the Yellowstone bears can be accomplished through other means and cost less money than reintroduction of the grizzly bears into the

Bitterroot Ecosystem. The most popular suggestion is to transplant healthy grizzly bears from other areas to boost the gene pool of the isolated pockets.

- “Money could be more wisely spent for the good of the bears by capturing a few breeding age bears from each of the healthy populations and transplanting them among the other populations. This would diversify the gene pool.”
- “...the declared need by some biologists for a diversified gene pool is asinine. The same gene cross fertilization can be accomplished by transplanting male grizzlies from one existing population to another.”
- “I have read that a major concern of your office is that there is not enough genetic diversity in the existing populations of Grizzly Bears, such as in the Yellowstone or Glacier or Yaak areas. I, too, am concerned about that and think money could be more wisely spent for the good of the bears by capturing a few breeding age bears from each of the healthy populations and transplanting them among the other populations. This would diversify the gene pool, without costing millions of dollars that would have been spent on reintroduction, education, and future management of Grizzlies in the Bitterroot.”
- “The area does not need them. It doesn't seem to have the food chain support for much more than a small population of bears - 15 or so - which is not a good number for reproductive needs and a good gene pool.
- “Given this limited range and the fact that much of this range is in the form of isolated pockets the survival of a genetically viable grizzly population is by no means ensured.
- (Governor Kempthorne’s Letter)... “Importantly, with respect to the proposed BE experimental population, the FEIS did not provide a thorough evaluation of the detrimental impact to grizzly recovery and genetics which could result from establishing the nonessential experimental population... The 1993 FWS Grizzly Bear Recovery Plan indicates that all five of the existing grizzly bear populations in the lower 48 states are largely, if not completely, isolated from each other. Moreover, according to the FWS, establishing a grizzly population in the BE will not ensure connectivity among the current populations, and nor will the failure to establish the BE population appreciably diminish the survival probabilities of bears in the currently occupied systems.”

POPULATION STABILITY (403)

The comments on this issue are closely related to those made on genetic diversity and population corridor linkages. The general theme of supporters is the Bitterroot Ecosystem is conducive for a healthy grizzly bear population. Some respondents feel

because the grizzly bear is a threatened species, that it needs protection under the Endangered Species Act. Many feel more bears will be needed in the area to establish a healthy bear population and to increase their long-term survival.

- “When linkages between this ecosystem and others that hold populations of bears are connected then the bear may have a chance of survival.”
- “Restoring grizzlies to the Bitterroot Ecosystem will help ensure the health and survival of grizzly bears in the lower 48 states where they currently occupy less than 2 percent of their original habitat.”
- “The plan is soundly-conceived, based on good science; the Bitterroot ecosystem is large enough, sparsely populated and contains an ample variety and quantity of grizzly foods for long-term development of a sustainable population from the 5-bear-a-year-for-5-years introductory program.”
- “This plan has the potential to strengthen the gene pool and provide insurance against a catastrophic loss in any one of the ecosystems. It should not be abandoned!”
- “With the terrible devastation of bears nationally and internationally such a proposal goes against the obvious need to do everything possible to conserve and restore bear populations whenever possible. The native habitat of an endangered species is the ideal location for maintaining a healthy population, and the Selway-Bitterroot Ecosystem can provide such an opportunity.”
- “This area would provide a tremendous boost to the effort to conserve a viable population of these bears in the contiguous 48 states.
- [The Wildlife Society]...” believes that the reintroduction of grizzly bears into the Selway-Bitterroot Wilderness area is integral to maintaining the viability of existing populations. Currently, there are only two viable grizzly bear populations in the contiguous 48 states. These populations are small and isolated from one another, making them vulnerable to extinction, and there is a lack of dispersal corridors connecting them due to human development and sprawl. The FEIS for grizzly recovery presented sound evidence that the addition of a population to the Bitterroot ecosystem would provide a potential link between existing populations and increase the probability of movements between them.
- “Because the grizzly bear is a threatened species, we must work to protect its population; it's the law.”
- “The Selway-Bitterroot ecosystem is a perfect environment for a grizzly population. The re-introduction of grizzlies into this area would help to remedy the

"island population" dilemma and encourage gene diversity and long term success of re-establishing the grizzly in its ancestral homeland."

- "The Bitterroot ecosystem offers millions of acres of designated wilderness contributing an abundance of food for bears as well as a miniscule probability for conflicts between grizzlies and humans. Not only will the bears survive in the Bitterroot ecosystem, but restoring grizzlies to this climate will also help to ensure the health and survival of the grizzly bear population in the lower 48 states, where they currently occupy less than 2 percent of their original habitat."
- "The recent issue about Grizzly Bears "Cornered" in a recent National Geographic magazine exemplified the peril that grizzly bears are facing. The article implied that the great bear is in danger and that current grizzly bear acreage is not enough to maintain a viable population of these great animals. Other areas will be needed for reintroduction to allow for the survival of the Great Bear. The Bitterroot Ecosystem is such a place where grizzlies can once again roam."
- "Establishing a healthy Grizzly bear population in the wilderness of Central Idaho and Western Montana is critical to the recovery and persistence of the species and too important an initiative to be sacrificed as a political favor."
- "I found myself astounded reading this poor administrative decision to take no action on the stabilization of the grizzly population in the U.S."
- "...if you do ignore the risk to the recovery and survivability of the grizzly bear in its natural environment--it will certainly go away--forever. We Americans are the direct cause of the reduction in the population of the grizzly and are just as responsible to be the cause of its recovery."

Several respondents feel that grizzly bear recovery in the Bitterroot Ecosystem is not needed for the long-term survival of the bear. These respondents usually claim there are enough bears now. Many respondents feel an increase in grizzly bear population will be a direct threat to their safety (see issue 501 for more of these comments). A handful of respondents feel that natural recovery is the way to go.

- "Grizzly Bear population recovery should be a natural recovery process not a manipulated, engineered, contrived, "managed" "controlled" population."
- "Grizzly bears naturally exist in the subject ecosystem and cultivating them to increase the population and expand their range is an invitation to disaster for the residents of the adjacent areas."

- “With 54,000 Grizzlies in North America, and 1,000 to 1,100 in Montana, Idaho and Wyoming, it would suggest we have enough bears. yet the USFW continues to press for the reintroduction, against the wishes of the local population.”
- “I would concur that they should be reintroduced if their species were immediately in danger, but this is clearly not the case, considering the robust populations currently residing in Alaska, Canada and the Asian Continent. Accordingly, interspecies diversity is also not an immediate issue, since these populations serve as a future genetic reservoirs for the Glacier and Yellowstone ecosystems, if necessary.”

SECURE HABITAT (404)

ADEQUATE FOOD SOURCES (405)

Size of the Habitat Area and Measures to Protect Habitat:

Numerous respondents praise the merits of the Bitterroot Ecosystem for its size and area of designated wilderness. They claim the area is large enough to support grizzly bears habitat and also keep them far away from people. Many people claim the “no action” proposal does little to protect the habitat needed by grizzly bears. These people feel that resource extraction activities will continue as in the past and this will have a negative impact on a recovering population of grizzly bears. Many people support alternative 4, the Conservation Biology alternative, because it forces the FWS to recover grizzlies through habitat protection measures.

- “Grizzly bears just don't have enough space or connected habitat for the populations to ever be recovered and removed from the Endangered Species Act. Having grizzlies in the wilderness of central Idaho would provide another sub-population and greatly improve the bear's prospects. The habitat there is excellent and includes millions of acres of designated wilderness.”
- “The plan is soundly-conceived, based on good science; the Bitterroot Ecosystem is large enough, sparsely populated and contains an ample variety and quantity of grizzly foods for long-term development of a sustainable population from the 5-bear-a-year-for-5-years introductory program.”
- “The ecosystem in question is perfect for grizzly habitat in that the millions of acres of designated wilderness have very little potential for conflict with humans or livestock.”
- “This area has millions of acres of designated wilderness which have little potential for conflict with humans or livestock. Grizzlies need, as you know,

hundreds of miles around them to thrive. This would, in fact, be one of the best areas in the lower 48 states to insure recovery of these magnificent animals.”

- “Especially important is to guarantee that sufficient habitat in Idaho is preserved and that protection for the bear be ensured from political manipulation.”
- “From a point of science, we need all species represented to sustain a balanced, healthy and complete ecosystem. Following a methodical and lengthy public process, the U.S. Fish and Wildlife Service agreed that Idaho contains the habitat needed to support grizzly bear recovery, a species designated as "threatened" under the Endangered Species Act. This habitat is critical to a recovery plan because it would provide a "link" or "corridor" between isolated grizzly populations in the United States and Canada.”
- “Of the remaining potential grizzly bear habitat in the lower 48 states, the Selway-Bitterroot area has the best potential for grizzly bear recovery due to the large wilderness area. It is also located between other remaining isolated grizzly bear populations, which would provide some connectivity between populations. If we can't restore the bear to the Selway-Bitterroot, we can't do it anywhere.”
- “The ultimate success of the grizzly reintroduction with negligible undesirable consequences is suggested by the history of grizzlies in the Bob Marshall Wilderness in Montana. Grizzlies have existed there with few problems. The area proposed for the Bitterroot reintroduction is similarly wild and undeveloped, but its much larger size is further reason to expect peaceful coexistence between grizzlies and man.”
- “This wilderness area is the perfect place to conduct such a recovery project due to its remoteness and inaccessibility to most people. This means the bears could live in relative peace from disturbance by man and man could be relatively undisturbed by the bear.”
- “A significant feature of this region is its geographic location, nestled between four of the five remaining isolated populations of grizzly bears.”
- “If we cannot bring back grizzlies to such a remote and vast wilderness, then where can we do it?”
- “Man is destroying habitat at an alarming rate, these animals need migratory corridors and protection of their habitat. A high priority should be to protect our remaining road less areas, linkage zones, and other areas threatened by the administration's energy and logging proposals.”

- “I feel that the government must continue to fulfill its mandate to protect endangered species, and to restore native wildlife species to those suitable habitats from which they have been extirpated.”
- “This alternative maximizes the restoration of grizzlies in Idaho, by including protections and sufficient habitat. It also prevents giving the last say to Idaho's governor who is on the record as being opposed to grizzly bears.”
- “The Bitterroot is the last, best place for recovering grizzlies in the lower 48 states. If we do not seize this opportunity, the future of the grizzly is indeed uncertain. The Bitterroot ecosystem contains excellent habitat and 4 million acres of designated wilderness. There is very little potential for conflict with humans or livestock. Ms. Norton and other politicians have been paying endless lip service to local control and collaborative approaches; and now, instead of seizing this unique opportunity, they shoot it down.”
- [Petition 2]... “It's outrageous ... and the result of intense political pressure from the powerful mining, timber, and oil and gas industries that want to delist the grizzly so they can plunder its habitat...And once their habitat is gone ...the grizzly bears will perish too.”
- “Alternative 4 recognizes that bears may already be in the area and should receive full protection. This latter point is important as cooperative efforts are underway to document grizzlies in the region.”

Some respondents claim the grizzly bear is a “plains” animal and, therefore, does not belong in the mountainous areas of the Bitterroot Ecosystem. A few respondents claim the bears would be there now if the habitat was conducive to a grizzly bear population. One individual alleges the research claims that there is enough secure habitat are not credible-- the scientists claiming so have a vested interest in the outcome.

- “How can they benefit by being placed in a new home which has bounds and limits substantially more confining than the vastness from which they were plucked?”
- “Grizzly bears are by nature a plains animal, their natural habitat being far from the mountains.”
- “As for suitable habitat, let the preservationists like the wildlife society buy the necessary land and dedicate it to the bears.”
- “It is my belief that the Grizzly Bear would be in these mountains now, if it was a ecosystem that met their needs.”

- “University of Wisconsin researcher Mark Boyce alleged that the Selway-Bitterroot contains habitat for over 300 grizzlies. Unfortunately one can't rely on the credibility of these people because virtually all of them want more grizzlies, and they have a vested interest in the outcome- money for "research". ...a liar with a PhD is still a liar.”
- “The grizzly used to be in the plains areas of Montana until civilization pushed them to the mountains, but are you trying to put them back in the plains?”
- “There really is no need to expand existing occupied habitat as long as we are willing to protect the bears where they now are by changing hunting laws they allow hunters in bear habitat and result in encounters that get bears shot. It is guns that kill bears, not roads, timber harvesting, mining, or other uses.”
- “There is no scientific information that there is sufficient habitat for them and that they were ever there in great numbers.”
- “There is no habitat for them and there is no scientific proof that there is. They will be right down in the valley causing problems with humans.”
- “Alternative 2, as explained in the FEIS, is not inherently anti-bear. If implemented, which the agency gives every indication it would not do, it would lead to additional protection upon discovery of grizzlies in the recovery area. However, the government intends it to be an alternative hostile to grizzly recovery, much like alternative 3, and has proven this hostility through past actions that will thwart any possible recovery through neglect and failure to recognize that bears may use the area. Since experience tells us we can't trust the agency to follow the spirit or letter of the ESA when given any discretion whatsoever, the only acceptable and legal option is the conservation Biology Alternative which forces the agency to recover grizzlies through proven habitat protection measures.”

Availability of Food Sources:

Numerous respondents feel there is an abundant food supply to support a grizzly bear population. These people feel there is an over reaction to the safety issue in that grizzly bears are usually omnivores. Also, they claim the abundant food supply in a large area of wilderness would provide few conflicts between grizzlies and humans.

- “I have just returned from a trip through this area, having driven the MacGruder corridor (Old Nez Perce Trail). This area is rich in bear grass, berries, and other plants that grizzlies depend upon for survival. The area is "Perfect" for grizzly bears and is so vast that I doubt that any person would come into contact with one while hiking or camping there. In addition, there are so few people in this area because it is so remote. Why not let the bears and wolves have it? It was once theirs!”

- “The Bitterroot Ecosystem has millions of acres of designated wilderness offering an abundance of food for bears and minimal chances for conflicts between bears and people.”
- “...the Bitterroot ecosystem would be an ideal spot for the great task of re-introducing a significant grizzly population into the lower 48 states. There is a steady food supply in that area, enough to support a large population of bears.”
- “I understand that the Administration has concerns regarding conflicts between bears and man. It is not likely that the bear would significantly interact with man based on the amount of designated wilderness within the ecosystem. An abundance of food in this healthy ecosystem will keep bears away from population centers.”

Other respondents take an opposing viewpoint and contend there is not enough food for a population of grizzly bears in the Bitterroot Ecosystem. Many state that adequate natural food sources for the bear (salmon, white bark pine masts, and huckleberries) do not exist in the area, and bears will come into conflict with humans in its search for food.

- “We strongly agree with Bitterroot National Forest Supervisor Steve Kelly that the habitat is insufficient to sustain the bears. Because of lack of habitat we see the possibility of bears moving down into the valley for food. This will result in human-bear confrontations. Since we own property in the foothills near Victor, we are very concerned about the impact bears in the area will have on our safety and the safety of our animals. Our rights as property owners will be affected by the bears. It is our understanding that our ranch is located within the boundaries of the recovery area. Grizzly bears will have an effect on everything we do: ranching, recreating, woodcutting, hunting, hiking, fishing, horseback riding. We do not want to confront a grizzly in our orchard because there is no food in the forest.”
- “We also feel that there is not enough natural food to feed these bears, so they will turn to other sources and that means our farmers' and ranchers' livestock and an occasional human being.”
- “Problem one: grizzly bears are dangerous. When these grizzly bears are hungry do we assume that they are so reclusive that they would rather stay in the hills and starve than journey down to the Bitterroot River to fish or rummage through trash.”
- “I live here and ride and hunt in the Selway, there is not enough food for the big bear.”
- “Also, the habitat for the bears is poor at best (fish are gone and vegetation is unsatisfactory), and it would cause no end of trouble for local Montana and Idaho citizens.”

- “Grizzly bears have never inhabited the area that was selected for introduction. Although they were once present in the extreme northwest portion of the central Idaho mountains, their primary source of nutrition was salmon. The fish population of that area is now far too low to sustain any number of these bears. Their only alternative would be to leave that area, and search for food in populated parts of eastern Idaho and western Montana, preying on livestock that could be found there.”
- “Our area is not the same as it was in the past (100 years ago) because of changes that have occurred through human contacts. The Selway-Bitterroot area no longer can supply the food needs of the G. Bears (fish and vegetation)...Also predicted wildfires in this area can only further destroy the bears' food needs. To introduce them to this hostile environment makes no sense, and it wouldn't be long until these bears migrated down into our Ravalli County valley floor in search of needed food...”
- “We have also learned more on what bears fed on historically and what is available today. Quality, quantity and variety have been lost. There is a question of how well the bear will manage, especially during drought years. With any failure in today's limited food source, there will be significant human conflict. Even under the best habitat conditions, bears get into trouble. A prime example is the Ninemile grizzly which got into trouble earlier this summer.”
- “Who doesn't understand that grizzly bears have accidentally roamed the Selway-Bitterroot and not found the area to their liking? According to Bud Moore in his book the Song of the Lochsa, grizzly bears did roam the area early in this century and left once the spring salmon runs disappeared.”
- “The wilderness no longer has the fish that it once had. The original Environmental Impact Statement (EIS) incorrectly assumes a healthy population of white bark pine, which provides a large seed heavy in both fat and carbohydrates. I am told by local sources that the white bark pine population is not healthy and would not produce the food sources assumed by the EIS.”
- “Two of the major food sources of the grizzly--whitebark pine and anadromous fishery--are now gone and this wilderness is an unreliable huckleberry producing region. Grizzly bears should not be put into habitat that cannot provide adequate food for survival or they will be forced to seek food near human habitation--i.e. garbage, pets, gardens and orchards.”
- “My wife and I live within 5 miles of that primitive area and bear come onto our property looking for food. That means only one thing, there is not, and I repeat, there is not enough food for them in the Bitterroot Selway! Stop the dumb re-introduction process! People's lives will be in grave danger.”

CUMULATIVE EFFECTS OF “NO ACTION” (406)

A few respondents feel there could be cumulative effects from the proposal for “no action”. They feel there would be an impact to the grizzly bears due to genetic isolation. They also claim the “no action” proposal could have an impact on the delisting of the grizzly bear from federal protection under the Endangered Species Act. One respondent is concerned the decision for “no action” was made without input from those entities knowledgeable about grizzly bears or the recovery plan. In this case there could be future ramifications on the entire public involvement and decision-making process.

- “We are deeply troubled by the fact that this decision was made without any input from federal, state, private, or academic scientists knowledgeable about grizzly bears or it's recovery plan. The Interagency Grizzly Bear Committee (IGBC), composed of federal and state agency representatives, who have overseen grizzly bear recovery efforts since the 1970's, as well as the US Fish and Wildlife Service (USFWS) grizzly bears experts, were completely ignored in this matter.”
- “The BE is identified as a grizzly bear recovery area in the Fish and Wildlife Service's 1993 Recovery plan. Restoration of grizzly bears to the BE is a crucial step that must be accomplished before serious consideration can be given to delisting the grizzly bear from federal protection under the Endangered Species act.”
- “Therefore I urge you to reverse your decision and do everything possible to propagate this magnificent animal and preserve in their current pristine conditions, the mountains, forests, and streams in which the Grizzly can thrive.”
- “Long term success of any area involves protection and conservation of the natural systems.”
- “As it stands now, these great bears may never have another chance. By the time the "no action" status is lifted, it may be too late for them.”
- “...please put into perspective the risk of bear attack versus the risk of losing the bears and the ecological benefit they provide.”
- “The FEIS found that under the No Action Alternative "there is only a remote likelihood that recovery of grizzly bears in the BE would occur through natural

recolonization because grizzly bears do not readily colonize distant, disjunct areas such as the BE" (FEIS 2-46)."

- "USFWS conducted no NEPA analysis on the source bears' parent populations...Timely delisting of the Yellowstone population may be jeopardized if bears are taken out of Yellowstone for reintroduction elsewhere."
- "The North Cascades Ecosystem remains the only official grizzly recovery area without an implemented recovery plan. The North Cascades subcommittee of the Interagency Grizzly Bear Committee had been preparing a request for funds to start that process. Following your announcement to suspend the Record of Decision in the Bitterroots, the North Cascades subcommittee withdrew its fund request, citing "the uncertainty of timing." That action was taken in direct response to the uncertainty created by your backtracking in the Bitterroots."

RECOVERY OF OTHER GRIZZLY BEAR POPULATIONS (SOURCE POPULATIONS (407))

Numerous respondents feel the Selway-Bitterroot wilderness holds the key to the long-term survival of grizzly bears in the lower 48 states. Many claim restoring grizzly bears to this area will help ensure the health and survival of other populations in the lower 48 states, where they currently occupy less than 2 percent of their original habitat. On the other hand, some people are concerned about funding being diverted from recovery priorities in other areas. A few point out that grizzly bears in three other ecosystems warrant listing as endangered, rather than their current designation as threatened.

- "A repopulated Bitterroot range would increase bear numbers and foster vital connections between other populations. This would diminish the very real possibility of further declines in Yellowstone's North American brown bear population due to genetic isolation."
- "The extremely small grizzly bear populations in the northwestern Montana and northern Idaho (each with only 30-50 bears) have been found to be warranted to be listed as "endangered" although still listed as "threatened." These are the closest populations to the Bitterroots and their likelihood of persistence would be greatly enhanced by establishment of connections to a larger restored population in the Bitterroots."
- "The Bitterroot ecosystem offers millions of acres of designated wilderness contributing an abundance of food for bears as well as a miniscule probability for conflicts between grizzlies and humans. Not only will the bears survive in the Bitterroot ecosystem, but restoring grizzlies to this climate will also help to ensure

the health and survival of the grizzly bear population in the lower 48 states, where they currently occupy less than 2 percent of their original habitat.”

- “According to the FEIS, “the potential for grizzly bear recovery will be enhanced in the lower 48 states by inclusion of the BE (Bitterroot Ecosystem) because habitat will be increased by almost 10,000 square miles or almost 25%. Further, the FEIS recognized that the additional population of grizzly bears will add to the known populations and therefore provide for a higher recovery potential for the species as a whole, decreasing the amount of time the species is on the Endangered Species List and the regulatory burden placed on the public” (FEIS 1-4). And according to the final regulation, “if the experimental population is successful; it will enhance grizzly bear survival and conservation over the long term by providing an additional population and thus adding a measure of security of the species” (Federal Register, November 17, 2000, pg. 69625).”
- “I vote for the no action alternative so that money, time, and manpower can be used to implement recovery plans for each bear population in the areas where they already exist.”
- “Why would we want to take deliberate actions to endanger bears when there is a healthy population in other parts of the country? I sincerely hope that the decision to reintroduce the grizzlies will be reversed. It is my belief that the original decision was based on romantic notions and bad science.”

EFFECTS FROM GRIZZLIES (500)

Supporters of reintroduction believe there is little conflict between grizzly bears and humans or livestock. Supporters of the previous Alternative 1, Citizen Management, think land management activities are compatible with grizzly bear reintroduction. Other specific comments are covered in codes 501 – 508 of this report.

- “The Bitterroot is the last best place to recover the species...very little potential for conflict with humans or livestock.”
- “When we build our homes in the habitat of wildlife, we must assume some responsibility in co-existing with the wildlife. When we hike in the outdoors, it is the same. We can co-exist.”

Comments from those opposed to reintroduction reflect concerns with numerous negative impacts to the livelihoods and lifestyles of local residents, especially areas in central Idaho and the Bitterroot Valley of western Montana that are adjacent to the Bitterroot Ecosystem. Other concerns are reflected in codes 501 – 508 of this report.

- “Our rights as property owners will be affected by the bears. It is our understanding that our ranch is located within the boundaries of the recovery area. Grizzly bears will have an effect on everything we do: ranching, recreating, woodcutting, hunting, hiking, fishing, horseback riding. We do not want to confront a grizzly in our orchard because there is no food in the forest.”
- “The first question to be asked is, "Who benefits from this gross error in management judgment?" Certainly the vast number of people who are financing the program do not. Neither do the everyday citizens who reside in the state of Idaho, who are faced with potential restrictions in land use or even worse placement of their personal safety or that of their family in jeopardy. ...Nor is there any benefit to the ranchers and their livestock...What about the other game animals such as deer and elk that provide a fair amount of the menu for large predators? According to recent studies by the Idaho Dept. of Fish and Game the elk and deer herds in Central Idaho are already being hit hard by cougars and black bears. Why deliberately add another even larger predator to the equation?”
- “We have black bears down here in our yards every summer in search of food when conditions up higher do not support adequate food sources. We do not want the grizzlies down here too!”

EFFECTS FROM GRIZZLIES ON HUMAN HEALTH AND SAFETY (501)

Respondents on this issue were of two distinct and opposing viewpoints. One view is that grizzlies are certain to attack humans and livestock. These respondents are generally in favor of the “no action” alternative. Many of these people also contend that the residents neighboring the proposed reintroduction sites do not support grizzly bear reintroduction. Many also relate how they have enjoyed recreating in an area without the fear of grizzly bear encounters.

The other perspective is that grizzlies pose less of a threat than many believe; and in comparison to other dangers people live with, grizzly dangers are less risky. These respondents are generally split between favoring the previous Alternative 1 and Alternative 4. Several respondents from the surrounding areas disagree with the Governor of Idaho and say that they support grizzly reintroduction in their neighborhood. Some agree that grizzlies and humans do not mix from a safety standpoint; however, the Bitterroot ecosystem is so large that the likelihood of encounters is nil.

Bears are not a risk:

- “Statistical evidence indicates that human deaths from grizzly bear attacks are very uncommon. People are more likely to be killed from lightning strikes than by grizzly bears.”
- “I have encountered a grizzly in the wild on two occasions and those were some of the most special experiences I have ever had while hiking.”
- “Please compare the number of bear attacks that occur each year in this country to the number of human assaults and vehicular accidents, which make up the leading causes of death in this country. And, yet we do not propose to eradicate cars or driving or all the people who assault others.”
- “There is some small chance the bears will munch a few citizens over the years, but that chance is very remote for those who use their heads while in that area. Besides, a little danger now and then might make life more interesting. We are extremely soft and safety oriented compared to those who entered this land a couple hundred years ago.”
- “Living in Grizzly country is not a "scary" thing. I am proud to live where most all of our species are still intact.”
- “Governor Kempthorne's efforts to demonize the grizzly, as opposed to educating citizens as to their importance in the ecosystem, is a shallow fear tactic. If there is a flesh-eating carnivore that I would worry about when I was hiking, it would certainly be of the human variety. I don't think we are considering banning hunting from our natural spaces, and yet I would wager that there are many more fatalities from human/human encounters during hunting season than from bear/human encounters.”
- “As people who live in a rural community in the midst of grizzly bears, we have often commented on the absurdity of governor Kempthorne's fear mongering about flesh eating mammals.”
- “While there is no plan that will satisfy everyone, there was a good faith effort on the part of environmental groups and timber interests to come up with a management plan that would move grizzlies toward the ultimate goal of removing them from threatened status while meeting local concerns for safety and resource extraction.”
- “A few people have argued that this reintroduction will make the woods dangerous. Many years of experience by countless numbers of us Montanans prove otherwise.”
- “Our wilderness areas need grizzly bears to be complete. The idea that the bears are "blood thirsty carnivores" is absurd. The idea that if the bears are reintroduced into our state people will be hurt is equally absurd. Your scientists have told you this and, based upon much personal experience over the years and much study on my own, I concur with them.”

- “The stated concerns over public safety are also unconvincing. Based on extrapolations from areas with similar conditions, the frequency of human deaths or injury from grizzly bear attacks from a recovered population in the Bitterroot will be extremely rare. Overall, there is an average of about 3 human deaths caused by bear attacks per year in all of North America from polar bears, black bear and grizzly bears. In the Bob Marshall wilderness area of Montana, which is most similar to the wilderness areas in the Bitterroots, there has not been a human mortality from a grizzly attack since 1959.”
- “Far from being a 'vicious, anti-social carnivore', the bear I saw was not in the least bit interested in me, and in fact, fled quickly upon awareness of my presence. Clearly any large animal can be dangerous; however, the odds of being hurt or killed by a Grizzly fall far into the statistical irrelevance category and must be considered all but completely absurd. As a 39 year old, very fit, outdoor savvy individual trying to find evidence of Grizzly Bears, I felt lucky that I was able to find even one in three weeks of searching.”
- “In the sixteen years I have lived on the Front I have never heard so much as a historical rumor of an incident that would provide a foundation for concern about the "flesh eating monsters".”
- “The objections of Governor Dirk Kempthorne are without foundation. If we are to use the miniscule risk of human injury or death to keep grizzlies off of public land, then we might as well close down Sun Valley ski resort, and all ski resorts in Idaho since they are all on federal property. I practiced orthopedic surgery in Sun Valley for ten years where I saw ten to twenty injuries per day from skiing, many of them devastating injuries that changed the victim's lives forever. And we had several deaths per year from skiing accidents. So if we are to limit use of public land to only safe activities, then close the ski resorts. And while we're at it, let's prohibit the use of all terrain vehicles on public lands, since more people are killed each year in Alaska by ATV's than were killed during the entire twentieth century by bears.”
- “Another example that works well for the SBE is the Bob Marshall Wilderness in Montana. The Bob Marshall Wilderness is similarly remote wilderness area which experiences a level of human use similar to that of the SBE. Since 1959, only one human injury and one human death from grizzly bear attacks have occurred, and the death resulted from a hunter who shot and wounded the grizzly bear first. This example speaks for itself and clearly demonstrates that the fears of Governor Kempthorne and others are unfounded. If you put this mortality level in perspective, many more people are killed every year either by domestic dogs, poisonous snakes, bees or lightning than were ever killed by grizzly bears over record time. Most of the small numbers of grizzly-induced human deaths over the years have been a result of careless human practices or human error.”

- “...as far as the threats to human life, consider this- how many people are attacked by black bears, mountain lions and moose in the affected states of Montana and Idaho every ten years. Why must we then use our power to ban an animal due to "its" safety record?”
- [The Society for Conservation Biology]... “finds the explanations offered in the "no action" proposal inadequate and unconvincing. The concerns over public safety from a restored grizzly population in the BE are also overplayed... and the EIS estimates the likelihood of a human fatality following full recovery in the BE at perhaps 1 every 2-3 decades. This contrasts with the highest cause of preventable death to Idaho residents under age 75, which is illness derived from tobacco use, which killed 1,645 Idahoans in 1997. Public health concerns should be directed to significant problems rather than the exceedingly small possibility of death or injury from a grizzly bear attack.”
- “These grizzlies are afraid of people. Therefore, despite Governor Kempthorne's misguided and just plain goofy characterization of the grizzlies as "massive flesh-eating carnivores", these animals are not a threat to humans where the acreage of wild lands is high and the number of humans is relatively low.”
- “...there have been less people killed by grizzlies since 1900 than people killed yearly in the U.S. by falling beverage machines. Nothing is undertaken without some risk. Moreover, the slight risk would be even less if people were informed of precautions such as not leaving food out.”
- “This area has millions of acres of designated wilderness which have little potential for conflict with humans or livestock. Grizzlies need, as you know, hundreds of miles around them to thrive. This would, in fact, be one of the best areas in the lower 48 states to insure recovery of these magnificent animals.”
- “If the governor of Idaho is so concerned for human safety then maybe they should eliminate cell phones and reduce highway deaths! That is a more prudent action to save lives.”
- “It is always amazing to us that we don't ever hear of anyone having opposition to the black bear in any of the Pacific Northwest states and we wonder why. It is a well-known fact that the black bear is far more dangerous than the grizzly. People like our governor and other political citizens should educate themselves to make their arguments. Instead they sit in their "fat" jobs and try to make decisions for us. We want the grizzly bear.”
- “The people living in communities adjacent to the recovery area have more to fear from feral dogs and town drunks.”

- “We live and own land in grizzly country, the Swan, and we can truthfully say that we feel much safer and more secure hiking through grizzly country than driving our highways in western Montana.”
- “Lack of Support/Fear For Safety: Both of these claims are directly contradicted by scientifically gathered evidence and represent little more than poorly disguised efforts to meet the desires of Idaho Governor Kempthorne and small minorities in the two states that are pro-industry and anti-grizzly. In July of 1995, ...the Service contracted with Responsive Management, a professional polling firm...They found that 62% of locals were supportive of reintroduction, while only 26% were opposed. At the regional and national levels, support was even higher at 74% and 77% respectively. In addition, they found that only 12.5% of those responding cited human safety as an issue, while 81-85% said the presence of grizzlies would not affect their number of trips to the area. Finally, only 7% of those responding expressed a fear that grizzly reintroduction would result in "land use restrictions."
- “When walking through the wilderness...you are just as likely to be hit by a Falling tree as be attacked by a grizzly bear.”
- “There have been far more hikers killed by hypothermia, or hunters killed by self-inflicted wounds, then people killed by grizzly bears.”
- “The problem with grizzlies is not the grizzly but the people, who are too numerous, living in places they should never be living, and engaging in dangerous behaviors that provoke grizzly aggression.”
- “I live in grizzly country. Spending a recent summer in an area where there were several families of grizzlies, I have lived only 100m from where grizzlies actively fed. During this summer of intense feeding in human living area, NO one was hurt. What is the fear? Is it our preconceptions, our greed, or a deep fear of ourselves? Is the misconceived fear of 150 years ago (which wiped out the grizzlies in the first place...) still lingering in our uneducated hearts? Can we not see this issue has nothing to do with grizzlies, and everything to do with us?”
- “I visit Montana about three times a year and have hiked in Glacier Park many times and also hiked in areas around Thompson Pass, Thompson Falls and Plains Montana. I have lived in Western Montana in the past, and may relocate there in the future. I do not believe the grizzly bear poses a great threat to human safety. I have had much closer traffic near-accident misses just driving to the hiking area.”
- “Is a grizzly bear that more dangerous than a mama Black Bear with cubs, or a mad bull Moose or Elk?”

- “Grizzly introduction may improve tourism more than cause any danger to resident of the area. (The tourists would cause more danger to the residents than the actual grizzlies).”
- “While I recognize people's reluctance to live with grizzly bears in their area, I think that since they were there before and also that numerous communities in Alaska live peaceably with bears nearby are good arguments that they'd be able to deal with it (they don't necessarily have to like it - that may be too much to expect immediately).”
- “I am deathly afraid of grizzlies. What human, without a gun wouldn't be? But to deny their reintroduction because of fear or minor economic considerations would certainly discredit the USFWS.”
- “The governor of Idaho explained his opposition on the basis of public safety, which was a joke, following the statistics on deaths from auto accidents, scalding in hot pools, etc. He is obviously selling out to the timber industry.”
- “I have worked for the reintroduction of G. Bear since 1970. This is a very important decision. I worked on the Shoshone N.F. from 1957 - 1962, and worked in Griz habitat every day I was in the field. They are not the hazard most people believe.”
- “We live out here in the Rockies and if you treat the bears with respect and for their domain you will not be harmed by them. Most grizzly attacks come from stupidity. You have to be alert in the mountains and remember they are wild animals. Most locals take the time to learn the ways of the great bears and use common sense in dealing with them.”
- “I just returned from a trip to Idaho and Montana, where my two kids and I hiked in Bitterroots where the bears would be reintroduced. I would much prefer the shy presence of grizzlies in those woods than the constant roar of jet skis on Lake Como. Also, I feel much more threatened by my fellow citizens in camp grounds and game wardens armed with automatic pistols than I have ever felt by any animals in wild areas.”
- “Perhaps you made this decision out of gut-level feeling that somehow grizzly bears are evil; that it is good they were eradicated from the lower 48 and would cause death and mayhem. While grizzlies are wild animals and do on rare occasions attack humans, we are talking about a wilderness area millions of acres in size in which nature is supposed to reign supreme. Humans are the only guests. Grizzlies are part of this ecosystem and must return for it to truly reflect both our heritage and to function at its best.”

- “I am a geologist who has worked many summers in the mountains of Montana where grizzly bears are known to live. I have never seen a grizzly bear during those many months of work. Wild and remote country like the Bitterroots is ideal for grizzly bears and has minimal chance for negative interaction with humans. With the citizen oversight panel, the plan to introduce more grizzly bears into the wilderness is a good one.”

Bears pose a threat to human safety and personal well-being:

- “I like having a large wilderness area available for recreational purposes without having the additional worry of contending with large carnivores who are not hunted and therefore have little fear of humans.”
- “We strongly support the proposed "no-action" alternative. We thank God each day that there are no grizzlies being reintroduced, and hope that you stick by this decision forever. Many lives will have been saved by this decision not to reintroduce this large flesh eating carnivore.”
- “I do not feel safe picking huckleberries, walking on trails, picnicking or hunting in areas that have grizzlies.”
- “Comparing the number of people killed by grizzlies in the Bob Marshall wilderness to other places is also meaningless. Grizzlies were hunted there for many years, which tends to eliminate bears that don't respect people. It's anyone's guess how long this effect will last, since the hunting of grizzlies has been eliminated. I think it's safe to say that the grizzlies to be released in the Selway-Bitterroot will not be from the Bob Marshall.”
- “For many years, I have chosen to recreate (hike, camp, fish and hunt) in the Selway-Bitterroot Wilderness Area instead of other areas due to the lack of grizzly bears. Many others who I know or have known have recreated there for exactly the same safety reasons.”
- “I backpack the Bitterroots often and would like in the future to take my grand children with me without the worry of encountering grizzlies.”
- “I really don't care about all the "studies" that have been made about grizzly bears staying away from people and the low instance of attacks on people, because all it would take would be one attack for it to be too many!”
- “We suggest the introduction of grizzly bears in the Bitterroot Mountains is a criminal act. Over time, a fact of life is some people will be killed/injured by grizzly bears. ...To be 100% safe from grizzly bears, means no grizzly bear restored to the Bitterroot Mountains.”

- “We like to ride up these canyons and not worry about meeting a grizzly bear.”
- “Grizzlies are carnivores, and they eat the flesh of non-predator peaceful animals that co-exist with man and livestock. Grizzlies are...a threat to society...Wouldn't it be more advantageous if the government allowed more amicable animals & encouraged increased populations of ungulates.”
- “...the very presence of these predators in the more remote areas of Lemhi County places an additional burden on our agencies that provide public safety. Our law enforcement and medical service providers are already financially strapped.”
- “We live right next to Blodgett Canyon and my son and grandchildren live in the trees nearer to the canyon...Are you willing to be responsible for signing a death warrant for anyone encountering a grizzly here. Just look at the many grizzly bear encounters in Glacier Park and they have less people. We have more people here and no habitat to support grizzlies....Let's face it, grizzlies don't belong in the Bitterroot-Selway any more than dinosaurs do.”
- “Please don't transplant grizzly bears into the Bitterroot Wilderness- we would never feel free to hike the mountains near our place if the grizzlies were located here.”
- “As a native of Idaho, and an enthusiastic outdoorsman, I want to express my deep concerns over the Grizzly Bear Recovery program. I have a family, including grandchildren, who also enjoy the beauty of the Idaho wilderness. I certainly would not want to have the grizzly bear roaming the woods while my family is camping.”
- “I purchased my ranch as a habitat for the son of mine who has Vaker's Syndrome (deaf & blind). Your answer was - not to worry - they won't harm nor come your way! Then you announced your plan to introduce bears.”
- “...the bears would be right down here where the people are and the food is -- trouble, trouble, trouble.”
- “I'm against Grizzly Bear reintroduction in the Bitterroot. I think it's too dangerous. Even the Bible says man over animals.”
- “The Bitterroots are a high use recreation area for people like us who take young children with them. There is no way we want to constantly be worrying about an encounter with a grizzly bear when recreating!”
- “We enjoy using the Selway-Bitterroot and you have no right to expose us to flesh eating carnivores. The Bitterroot Valley is our home and we don't want grizzly bears terrifying us. Leave well enough alone.”

- “Grizzly bears have been a problem for people since Lewis and Clark first encountered them. Fifty years ago people ended the problem by eliminating the bears. Now that we have thousands of more people living around and frequenting the Selway-Bitterroot wilderness it makes no sense to reintroduce grizzlies.”
- [Idaho Farm Bureau Federation]... “IFBF policy opposes grizzly bear reintroduction in Idaho because of human, health/safety and economic impacts.”
- “I feel that bringing in another large predator that attacks and kills humans is tantamount to murder. How will you feel the first time one of your bear’s kills somebody? What will you say to the family? Do you think that they will be comforted by your blithe explanations about species recovery? Have you considered people at all?”
- “Thanks, but no thanks.... we don't need grizzlies...none of us could camp out and feel safe...its bad enough to have the wolves.... there is no such thing as people friendly grizzlies...whoever had this idea, should be the first one to camp out with their children and dog...let them find out just how friendly a grizzly can be.”
- “When your little daughter or son becomes prey and you lose them to a large predator...then, you speak...until then, please listen to those who will be living in close proximity to those "teeth and claws" and do the right thing. Don't reintroduce the grizzly bear to the wilderness area of the beautiful Selway-Bitterroot.”
- “If the bears are reintroduced, then bear/human contact is inevitable. Most of the problems will be initiated by people not using common sense or being in the wrong place at the wrong time. However, in an incident where a person is injured or killed, the bear will take the punishment for 'misbehaving.’”
- “As a hiker and backpacker I am quite nervous about bears. And I think it is an important point that, without abundant salmon runs the bears will have trouble finding food in the area.”
- “I also support most of the opposing arguments to reintroduction offered during the debate of the past 5 years, and the decisions of the early settlers and residents of the Bitterroot Valley to remove the grizzlies during the first third of the 20th century. They lived much closer to nature then, and knew more about the habits and dangers of living with grizzlies than we can know today. The fact that new reasons to oppose grizzly reintroduction continue to become obvious confirms the wisdom of their early decision.”

- “During the widespread wildfires of last year, had grizzly numbers been in this area as desired by the USFWS plan you opposed, a percentage of grizzlies would have been driven, panicked by the flames, into the populated areas of the Bitterroot Valley. Once here, in greater than usual numbers, the Grizzlies presence would have added to the hardship and fear of our residents, with possible loss of human life before they were hunted down and killed. Because the grizzlies were not here, they were not in harm's way.”

Threat to Wilderness Dams and Irrigation: Another issue raised is the relationship between the wilderness dams and the grizzly reintroduction. Irrigators who maintain the wilderness dams are also concerned about their safety when maintaining the dams.

- “We are part owners in the Big Creek Lakes Association. We depend on water from the dam for irrigation each summer. The dam pre-dates the Wilderness Act. Yet, we are very aware that it will be possible to close areas of the wilderness because of bears. Our association routinely makes trips to the dam to release water and do yearly maintenance. We believe if bears are reintroduced, that it will only be a matter of time before restrictions are placed on our ability to use and maintain Big Creek Lakes. Also, we have a concern for the safety of the individuals carrying out the work related to the dam. This will in turn create a liability issue for Big Creek Lakes Association. We believe that having the bears in the wilderness will severely restrict everyone's ability to enjoy the wilderness.”

Governor Kempthorne's comments relating to human safety:

- (Governor Kempthorne's Letter)... A study by Smith and Herrero (2000) of bear attacks in Alaska during the twentieth century demonstrates that grizzlies are by far the most dangerous of the bruins in the wild. They found that more than 80 percent (389) of the 475 attacks during the past 100 years in Alaska were due to grizzly and indicated that grizzly are "on average 21 times more dangerous than the black bear"... Smith and Herrero (2000) have demonstrated that as the human population in Alaska has grown during the past century (1900-1999), the number of human/bear encounters has increased from approximately 0.18 per year in 1900 to approximately 18.0 per year 2000. Data on human/ bear encounters collected in the Yellowstone ecosystem between 1993 and 1999 exhibit a similar trend. Annual encounters increased by 243 percent during this time period, rising from 28 in 1993 to 96 in 1999 (Gunther *et al.* 1993-1999). The data on bear-caused human injuries follow a similar pattern that is exemplified in two separate studies conducted in the Yellowstone ecosystem (Cole 1976, Gunther *et al.* (2000). A comparison of Cole's data (1930-1975) to the data of Gunther *et al.* (1992-1999) shows that human injuries increased from a average of 1.3 per year during the 1930-1975 period to approximately 3.9 during the 1992-1999 period.”

- (Governor Kempthorne's Letter).... "A recent study (Smith and Herrero 2000) demonstrates that recreationists (hunting/fishing/other) account for more than 80% of all bear attack victims in Alaska. In their 100-year study of human/bear encounters, Smith and Herrero found that the highest incidence of encounters occurred between June and September, during the peak of recreation season, when grizzly bears are voraciously foraging to fatten up for the winter (Hood and Parker 2001)...In sum, the volume of outdoor recreationists is on the rise (Driscoll 1996). This trend will be matched by an increase in the number of grizzly caused injuries (Merrill 1978, Herrero 1970, Vincent 1989). Expanding the bear's range will only add to the likelihood of more encounters and associated injuries."
- (Governor Kempthorne's Letter)... "The results of phone surveys reported in the FEIS indicated that nearly 85 percent of local respondents would not modify their use levels and patterns following bear reintroduction. However, the record shows that once users begin to encounter grizzly bears their attitudes towards bears do change (Herrero 1985, McMillion 1998, Chadwick 2001), along with their willingness to use areas inhabited by bears... Reintroduction of grizzlies would force most forest users to change their lifestyles and habits if grizzly were present.... According to Herrero (1985), humans will have to accept some level of danger or injury or even death due to grizzly attacks. This forces managers to determine the level of danger that is acceptable to most people, and the range across which this level of danger should be allowed. Clifford Martinka, the chief scientist of Glacier National Park, states: "You put grizzlies and people together and you are going to have problems. They are competing species" (Robbins 1988)."

Analysis of health and human safety in the FEIS:

Several respondents including Idaho's Governor Kempthorne claim the FEIS did not adequately address the impacts of grizzly bear reintroduction on health and human safety. On the other hand, some respondents feel the analysis in the FEIS was adequate.

- (Governor Kempthorne's Letter)..."The impacts of grizzly bears on human safety and security were not adequately evaluated in the FEIS. The subject of grizzly bear/human interactions is a critical issue that must be carefully weighed before any decision on reintroduction is made... During the 1960's, the rate of grizzly/human encounters in Yellowstone National Park escalated drastically. As the number of park users climbed, the rate of grizzly-inflicted human injuries rose to about five per year, or 0.00007 percent of total park users (Herrero 1970). Since the 1960's both encounter and injury rates have risen substantially... Several authors (Merrill 1978, Herrero 1970, Vincent 1989) have indicated that grizzly/ human interactions are going to occur, with the rate being a function of the ratio of bears to humans within a given area. Thus, the likelihood for encounters that result in injury or death increases as either the number of humans using a given area or the number of bears residing in an area increases... A comparison of human injury rates between two very different populations of park bears (Yellowstone and Denali National Park) provides

an excellent example of the relationship between bear residence and human area use... Since Denali has a higher density of grizzlies than Yellowstone (1/16.9 mi v. 1/25mi), it appears that higher bear density relative to visitor numbers results in a higher number of injuries... Basing expected visitor injuries on the previously demonstrated relationship between visitors and grizzly bear densities, the likelihood of human/ bear would be imminent with the BE. From these data, it also appears that the calculations for potential interactions and injuries resulting from human/grizzly encounters with the FEIS analysis area are gross underestimates... It is certain that the incidence of bear/human interactions and human injuries will increase as the human and grizzly bear population increase within the BE.”

- “In addition, the USFWS documentation about grizzly bears has dramatically underestimated the potential impacts on human health, domestic livestock and wildlife. We simply can not afford to make the same mistake with bears that we did with wolves.”
- “Safeguards for legitimate human safety concerns related to the reintroduction need to be an integral part of the programs, but were adequately addressed in the Final Environmental Impact Statement and Record of Decision. There is no scientific basis for a call to reexamine the findings that human safety will carry any further risk than the assessed projection of one potential human fatality in the area every 20-30 years.”
- “Further Consideration of Public Safety is Not Warranted. While the Federal Register notice withdrawing the reintroduction decisions suggests that further consideration of public safety is warranted, it offers no data or information to support such a conclusion. In fact, the draft and final EIS's offer voluminous statistical information on why concerns about public safety are NOT warranted. We believe that despite powerful evidence to the contrary, the Service is acceding to Gov. Kempthorne's misinformed viewpoint on the danger of grizzly bears.”

EFFECTS FROM GRIZZLIES ON HUNTING OPPORTUNITIES (502)

Respondents had differing views regarding the potential effects of grizzly bear reintroduction on hunting opportunities. Some respondents discuss the considerable effort in professional management of game populations to provide hunter opportunity. They feel that grizzly reintroduction would negate or complicate these efforts by reducing game and fish populations, and thus seriously impact hunter opportunity. Safety of hunters in “grizzly country” is also a concern. The hunting public is fearful of encounters with bears while they are hunting. Most of those comments are reflected in the quotes included in code 501 above.

- “There are many people in our area who hunt for sport and to put meat on the table. Because of lack of habitat for the grizzly bear, the elk and deer population will undoubtedly be affected negatively.”
- “The area in question is the only place other than Alaska where grizzlies might live without disturbing humans. Let us give it a try, if it does not work out, there are hunters who would enjoy again ridding the area of bears.”
- “Our organization of over four hundred hunters and anglers (mainly from the Clearwater River Basin of Idaho) opposes the introduction of grizzly bears for reason of their direct impact on our diminishing big game hunting opportunity in an environment of rapidly shrinking big game resources (elk, deer and moose), fewer options for the management of big game predators (black bears and mountain lions) and federally introduced predators (wolves). Introduction would bring those who hunt the Selway, Middle Fork and Lolo elk management zones less opportunity to hunt black bears with bait and hounds, mountain lions with hounds and more restrictions on the way elk, deer and moose can be hunted.”
- “I am a avid bow-hunter and the thought of reintroducing grizzlies into the Bitterroot ecosystem is alarming. During a recent visit to Alaska I could not help feeling uneasy about grizzlies visiting the camp frequently. Packing a bush rifle is a common thing up there and I would hate to have to do that here in Idaho.”
- “I am against the introduction/reintroduction of any predatory animal including wolves & cougars unless their numbers can be controlled and they learn to fear man due to hunting. If you allow for hunting OK. Otherwise not.”
- “Hunters and fishermen are in more danger of becoming extinct than the grizzly. I realize this is your long-term agenda to eliminate this part of our society and it is sad when these people contribute more to wildlife than anyone else. Northern MT (N of Kalispell) is a prime example, grizzly and wolf but no deer, moose, elk. USF&W has an agenda that benefits a few species and destroys populations of others. Is this conservation and in the best interest of our country? Not in my opinion, but who am I. Please quit catering to the minority.”
- “I will be happy to hunt and destroy any animals introduced into the Bitterroot that pose a threat to human health & safety.”

A few respondents are concerned that grizzly bears will be hunted. One respondent claims there is a conflict of interest for the hunting outfitters and guides as it is in their interest to conduct their hunting operations in a safe manner and to ensure there are adequate deer/elk/moose numbers.

- “I recognize that many people local to the area are opposed to the reintroduction of a predator into the area because they are worried about the safety of their children, and (mostly) about continuing their livelihood as hunters and guides in the area... It is because of the encroachment of the human population that the grizzly is no longer to be found in this area, and it seems to me to be something of a conflict of interest that the local businessmen oppose this reintroduction. After all, what they do was a prime factor in driving out the grizzly in the first place. I understand that they would like to conduct their hunting expeditions in a safe manner, with any predators (save man, of course) removed from the area so that their clients can have the opportunity to "bag" the deer or elk or moose of their choice. However, this doesn't seem to me to be the best reason to have wilderness areas in our country. These areas ought to be preserved as havens for the wildlife of North America, in some attempt to allow for the species diversity that is so critical to the survival of the planet.”
- “I'm very much in favor of the reintroduction of the grizzlies to the Bitterroot, and furthermore, in favor of designating their range area as a wilderness preserve. No hunting allowed into the area! Heavy penalties--jail time--for any poachers! Otherwise, the grizzlies introduced will be in constant danger. Look what happened to the wolves!”

EFFECTS FROM GRIZZLIES ON PUBLIC ACCESS & RECREATION (503)

Many respondents support the “no action” proposal because they feel grizzly reintroduction would negatively impact access and recreation opportunities. Some of these people claim the grizzly bears are being used by the USFWS as a tool to “lock them out” of certain areas. Numerous respondents comment on their traditional recreational uses in the area and how those uses would change if the grizzly bears were in the area.

- “People should be able to use the forests for recreation such as fishing, hunting, hiking, rock-hunting etc., as well as those who depend upon these areas for their livelihood, such as loggers, and outfitters.”
- “It's just another excuse to lock up more roads. I'm for "no action".”
- “Another concern to the counties located in the BE is the possibility of declining recreational opportunities in the BE due to the threat of grizzly attack. As stated by the Fremont County Board of County Commissioners in a recent letter to the Department and USFWS, " Families who would otherwise use and enjoy the area in absence of grizzly bears would think twice about subjecting their children to this kind of threat.”

- “Most Montana residents live here because they like outdoor recreation with as little restrictions as possible.”
- [The Back Country Horsemen of Montana]... “We feel that it would be costly counter-productive measure that would hinder outdoor recreation in the area.”
- “I hike and ride horses in the Selway and Bitterroot Mountains and I don't really want to encounter a Grizzly Bear. This area is too heavily populated to have Grizzly Bears.”
- “By bringing the grizzly bears into this area, which they are not native to, would for many people take away the enjoyment of the forest and the many activities that go along with it, not to mention the consideration of residents health and safety. My granddaughter, age 10, walks between my place and the cabin behind us, approximately half a mile. If the grizzly bears are introduced here, she will not be able to take those walks.”
- “For almost 30 years I have been taking boy scouts into the Bitterroot Mountains 12-13-14 years old. I am totally opposed to the reintroduction...”
- “By placing wilderness access restrictions on the rights of those of us living in this area, it will be easier to further increase the Federal ownership of the West above 58%.”
- “I want my sons to enjoy hunting and hiking and riding and all the rest without more predators lurking about.”
- “Though a diverse group, floaters from around the nation would suffer the most serious impact if a substantial population were to inhabit central Idaho.”
- (Governor Kempthorne’s Letter).... “A recent study (Smith and Herrero 2000) demonstrates that recreationists (hunting/fishing/other) account for more than 80% of all bear attack victims in Alaska. In their 100-year study of human/bear encounters, Smith and Herrero found that the highest incidence of encounters occurred between June and September, during the peak of recreation season, when grizzly bears are voraciously foraging to fatten up for the winter (Hood and Parker 2001)...In sum, the volume of outdoor recreationists is on the rise (Driscoll 1996). This trend will be matched by an increase in the number of grizzly caused injuries (Merrill 1978, Herrero 1970, Vincent 1989). Expanding the bear's range will only add to the likelihood of more encounters and associated injuries.”

Other respondents support the “Citizen Management” alternative because it was forged with the help of local recreation interests. They also claim the grizzly bear will only add to their recreational experiences.

- “Please reinstate the citizen management as the preferred alternative for the program. Central ID and western Montana are places that should have grizzlies. I have rafted in both these areas and in Alaska and know that humans can recreate in areas with grizzly bears.”
- “We are users. That is we horsepack for pleasure in the Bitterroot-Selway and want the return of the grizzlies. It is what wilderness is all about. Citizen management is innovative and respects the concerns of local citizens. Act not to reintroduce grizzlies.”
- “We live in Montana and routinely hike in the Bitterroot mountains. We write with anxious and mixed feelings, as we have enjoyed not worrying about grizzly bears while recreating with our two small children in our beloved wilderness areas. However our concern transcends this mere convenience...We urge the Fish and Wildlife Service to reinstate citizen management as the preferred alternative for grizzly recovery in central Idaho and Montana.”
- “I urge you to not cave in to pressure, and to implement the innovative, effective plan to restore populations of the Grizzly Bear to the Selway, Bitterroot Wilderness. I have spend many, many vacations in this wilderness fly-fishing, and as an avid recreationist, the presence of grizzly bears would only add to the allure of this enchanting area.”

EFFECTS FROM GRIZZLY BEARS ON LIVESTOCK AND PETS (504)

Respondents in support of the “no action” proposal feel the welfare of the livestock industry needs to be put ahead of the grizzly bears. They are concerned with the economic risk to ranchers and other livestock and pet owners. Idaho’s Governor Kempthorne points out the economic risk to ranchers and the FWS would not be able to respond to predation incidents in a timely manner.

- “The communities in the BE depend upon the rangeland to sustain their way of life through livestock grazing. Without the ability to use that rangeland in a safe manner, those communities are left with nothing.”
- “Last week there was a report that one of the wolves had killed 25 sheep near Dubois. This is a dog size animal weighing in at 130 to 150 pounds. Take that animal and multiply it by eight, add some bad dining traits and attitude and you have a grizzly.”
- “What she [Norton] is doing is listening to local people who do not want the severe consequences of human grizzly bear attacks and domestic livestock

depredations that will occur if the U.S. Fish and Wildlife Service somehow forces this terrible idea down our collective throats.”

- “I raise a few horses and the foals will be in extreme danger from any grizzlies re-introduced.”
- “Bears could kill livestock, ruin campsites and kill cows, pigs and other farm animals.”
- “The loss of one human, horse, cow, dog and cat is one too many and the US Fish and Wildlife Service should be held financially responsible.”
- “I think some of these conservationists are behaving like a dog with a bone. They want the grizzly reintroduced here - period. They don't seem to care about the people that live here or their livestock.”
- (Governor Kempthorne’s Letter)... “The presence of large carnivores has an impact not only on recreationists but also on land owners and livestock producers. “Grizzly bear predation on domestic livestock has become a chronic management problem in Wyoming in the past seven years” (Gunther et al. 1999). Within the Yellowstone population, 68 and 72 confirmed livestock kills occurred in 1998 and 1999, respectively. The requirement that a government official be on the kill site within 24 hours to confirm the cause of death, however, effectively means that many bear kills are not confirmed because it is not possible for the limited number of officials to respond in a timely manner to the number of calls they receive. Consequently, the number of confirmed kills documented by the government are much lower than that claimed by livestock operators.”

Respondents opposed to the “no action” proposal claim it was a result of pressure from the livestock industry and Idaho’s Governor Kempthorne.

- “The State of Idaho has sued to block the plan. The state of Idaho is owned by ranchers, so that is no surprise. The future of a species is far and away more important than their livestock industry. People can adapt in the ways that they go about earning money - grizzlies can't create new habitat to live in.”

Some respondents think the loss of a few livestock is a small price to pay, compared to the importance of recovering grizzly bears in their native habitat. They call for protection of the habitat in order to have that happen. Many people also point out that the Defenders

of Wildlife organization has agreed to compensate livestock owners for any losses caused by grizzly bears.

- “I understand farmers and ranchers are worried but there will always be cattle. A part of being a rancher is realizing you are going to lose a few here and there.”
- “It is essential for this type of program to be funded, and local control, as well as support from wildlife organizations, compensation for any livestock damage resulting from the reintroduction, etc. are addressed in this plan.”
- “Before the Fish and Wildlife Service cancels the project on fiscal grounds, all sources of private funding need to be exhausted first. Of note is the fact that the Defenders of Wildlife organization has agreed to compensate landowners for any loss of livestock caused by grizzly bears.”
- “...it should be noted that the conservation group, Defenders of Wildlife, has agreed to compensate landowners for any loss of livestock caused by grizzly bears.”
- “Defenders of Wildlife have agreed to compensate landowners for any loss of livestock caused by grizzly bears.”
- “Livestock can be compensated for financially; I, for one, would pay more taxes to help accomplish this...”
- “Please give the recovery of the grizzly priority over all other human concerns in their habitat! In particular, they need habitat off-limits to humans and livestock.”
- “The grizzly bears were inhabitants of these areas long before humans were and it would be wrong to keep them from their rightful home because some private individuals feel threatened with minor monetary loss to their livestock. That is just part of the cost of doing business.”
- “Wilderness areas should not be havens for cattle or sheep but should contain all components of wilderness including predators. While I sympathize with landowners who may lose livestock to predators, I cannot help but feel that everyone undergoes risks of various sorts in business and that natural predators are but one of those risks to livestock ranching on the edge of wild areas.”
- “I fully support grizzly bear recovery in the Selway-Bitterroot wilderness. I also understand why people do not support grizzly bear recovery. My parents are farmers/ranchers and we have predators who occasionally kill our livestock. It is just the cost of doing business. Needless to say, we are really mad when it happens, but

then we realize that the predators are just doing what they have done for thousands of years. People are intruding into the predator's space... not the other way around."

- "...the area is wholly surrounded by farming, ranching and urban areas. It is inevitable that these bears will wander out to the edges, get mixed up with livestock or humans, and have to be destroyed."

EFFECTS FROM GRIZZLIES ON OTHER PREDATORS OR ANIMALS (505)

Numerous respondents support the "no action" proposal because they feel the reintroduction of grizzly bears would decimate the game populations in the recovery area.

- "Because of lack of habitat for the grizzly bear, the elk and deer population will undoubtedly be affected negatively."
- "Our organization of over four hundred hunters and anglers (mainly from the Clearwater River Basin of Idaho) opposes the introduction of grizzly bears for reason of their direct impact on our diminishing big game hunting opportunity in an environment of rapidly shrinking big game resources (elk, deer and moose), fewer options for the management of big game predators (black bears and mountain lions) and federally introduced predators (wolves). Introduction would bring those who hunt the Selway, Middle Fork and Lolo elk management zones less opportunity to hunt black bears with bait and hounds, mountain lions with hounds and more restrictions on the way elk, deer and moose can be hunted."

Others feel there are enough predators in the ecosystem, and that it cannot support another predator. Some claim the grizzly bear would take the food sources away from other predators such as black bear, cougar, and wolves. The result would be a decline in the other predators' populations.

- "The impact on other resident species could be almost incalculable. Since grizzly bears are non-specific omnivorous predators, they will eat virtually anything they can catch. Salmon and steelhead are high on their list of preferred foodstuffs, and both are high on the endangered species list. Our elk herds are already decreasing rapidly, most likely due to the presence of large numbers of wolves feeding on their calves...The presence of another dominating predator in the region can be good news for neither elk nor wolves."
- "We simply do not need more predation on our big game herds that are already on the decline due to predation by the black bear, cougar, and now wolves."
- "I have also heard they will chase the little black bears out, and the black bears don't bother the livestock."

- “What will happen to our resident black bears who are not aggressive if the grizzly is reintroduced?”

A few comments refer to the gray wolf transplants into central Idaho. People think monitoring and research of the impacts of the gray wolves should be conducted before grizzly bears are added to the ecosystem.

- “Please take into consideration the effect the wolves are having on our big game herds and do not add yet another predator to this area.”
- “We are already seeing the ill effects of wolf introduction with no population control, on elk herds, and grizzly introduction would only compound the problem.”

A few respondents claim predators have been unjustly maligned over the years. These people say science has shown us the importance of predators to a balanced ecosystem. They also feel the size of the recovery area is large enough to mitigate any problems between grizzly bears and other predators.

- “The plan is soundly-conceived, based on good science; the Bitterroot ecosystem is large enough, sparsely populated and contains an ample variety and quantity of grizzly foods for long-term development of a sustainable population from the 5-bear-a-year-for-5-years introductory program.”
- “Predators have been much maligned for centuries in this country and in Europe and elsewhere. Even the great conservative Teddy Roosevelt made the mistake of ordering the elimination of all predators on the Kaibab Plateau, only to regret it later when he saw how devastated the area and even the game, which he was attempting to protect. Science has shown us the importance of predators to ecosystems and public attitude has changed dramatically. Where wolves were once the personification of evil, they have become a cherished symbol of wilderness and even "family" values. It is indeed unfortunate if the prejudice against predators is now under girding decisions at the Interior Department.”
- “Furthermore, there are wolves in the Bitterroot ecosystem and the correlation between wolves and grizzlies is a wonder to behold. There is a distinct correspondence between the two entities, which complement one another in their world of survival. The reintroduction of the grizzly would be a definite benefit to the ecosystem.”

MANAGEMENT OF PUBLIC LANDS (506)

EFFECTS FROM GRIZZLIES ON PRIVATE LANDS (507)

Many respondents are concerned that grizzly bear reintroduction would cause numerous negative impacts to the lifestyles and livelihoods of local residents, especially areas adjacent to the Bitterroot Ecosystem. Several respondents feel land use restrictions will be imposed from grizzly bear management. There is a distrust of the FEIS analyses that indicate minimal impacts to extractive industries, recreation opportunities, and human safety. Several local residents are afraid of being “shut out” of public lands. Some respondents list their concerns and then voice their support for the “no action” proposal. A group of wilderness dam owners voice their concern with how their access to irrigation dams in the area would be affected.

- “Another issue that is rarely discussed is the relationship between the wilderness dams and the grizzly reintroduction. We are part owners in the Big Creek Lakes Association. We depend on water from the dam for irrigation each summer. The dam pre-dates the Wilderness Act. Yet, we are very aware that it will be possible to close areas of the wilderness because of bears. Our association routinely makes trips to the dam to release water and do yearly maintenance. We believe if bears are reintroduced, that it will only be a matter of time before restrictions are placed on our ability to use and maintain Big Creek Lakes.”
- “Our rights as property owners will be affected by the bears. It is our understanding that our ranch is located within the boundaries of the recovery area. Grizzly bears will have an effect on everything we do: ranching, recreating, woodcutting, hunting, hiking, fishing, and horseback riding. We do not want to confront a grizzly in our orchard because there is no food in the forest.”
- “Is there an ECONOMIC IMPACT STATEMENT that shows the effect grizzly bears will have on ranching, farming, logging, recreation and outfitting? We doubt that much research has been given to how reintroduction will affect the economic conditions of the Bitterroot Valley.”
- “It is our understanding that our ranch is located within the boundaries of the recovery area. Grizzly bears will have an effect on everything we do: ranching, recreating, woodcutting, hunting, hiking, fishing, and horseback riding. We do not want to confront a grizzly in our orchard because there is no food in the forest.”
- “Worst of all, they are the tool that extremists have used to nearly stop timber management and harvest on public lands. As an employee of Pyramid Mountain Lumber Company, my job and livelihood is threatened by curtailment of timber sales. Most of the curtailment to date has been justified as protective measures for grizzlies.”
- “I understand that Jamie Rappaport Clark, the National Wildlife Federation's Senior Vice President for Conservation has stated, Gray wolves would not be thriving in Yellowstone National Park and central Idaho today if Secretary

Norton's policy had been in place when that recovery got underway. I say it's too bad that Secretary Norton's policy wasn't in place then. The local ranchers would be a lot happier without the wolves chewing up their livestock.”

Other respondents feel some limitations on human activities will be necessary in order to have grizzly bear recovery. Several people who supported the original decision as outlined in the Record of Decision feel that grizzly bears and humans can coexist, and that extractive activities can continue with a few compromises made. They praise the “citizen management” aspects of the original decision as support of those kinds of compromises.

- “The citizen management plan for the reintroduction of grizzly bears is an excellent way of reintroducing this predator. Locals do not feel as if they are being pushed into something that could endanger their businesses. They are included and very much a part of the reintroduction. I oppose anyone opposing the citizen management plan. This makes the reintroduction of a legendary animal community effort, and insures it to work smoothly.”
- “I encourage the Service to initiate the proposed alternative that allows cooperative management between environmental, industry, tribal, federal, and state interests.”
- “As far as I can tell, no personal property rights or grazing leases would be lost due to grizzly reintroduction in the BF as laid forth in the preferred alternative.”
- “From the vast number of articles and research we have done, there appears to be no cogent, logical reason to thwart this important initiative. Although seemingly controversial it is quite clear the plan has won overwhelming support by the US Fish and Wildlife Service, the local business community surrounding the wilderness area and the local public interest organizations. More importantly, according to our research, representatives from both the timber industry and local forestry department have whole heartedly endorsed the reintroduction program.”
- “So whatever oppositions to the grizzly recovery program by local hunters and ranchers in Idaho must be overcome. They must learn to live with the grizzly, and be proud that a special unique animal walks their wild lands. The citizen management plan is an innovative way to make federal wildlife laws work for grizzlies and other vanishing wildlife while respecting the concerns of local citizens.”
- “I believe the rights of ranchers can be protected without giving up on our bears.”
- “The Bush administration has, on many occasions, voiced its concern and support for local involvement in these decisions. Well, in this case there has been local

involvement, including private citizens, timber and mining interests, local politicians, and landowners. I own remote property in Selkirk Mountains of northern Idaho and I am very much in favor of the reintroduction program.”

Numerous respondents reaffirm their commitment to Alternative 4, Reintroduction of a Threatened Population with full protection of the Endangered Species Act. The goal of that alternative is to achieve recovery through reintroduction and extensive habitat protection and enhancement to promote natural recovery. They support restrictions on resource extraction activities, and feel ecosystem protection (especially roadless areas) and restoration of the managed landscape are beneficial to all species, including humans. Several also contend the proposal for the livestock industry and Governor Kempthorne of Idaho politically motivate “no action”.

- “Please do not allow extremists in the ranching industry to delay or halt the restoration of grizzlies.”
- “With numbers of less than 1,000 in the U.S., the grizzly bear is obviously an endangered species and everything humanly possible should be done to save grizzly habitat from destruction by commercial development.”
- “The local seems ideal, providing a link to Canadian grizzlies, and I thought the plans were approved and all set to go, with wide public support. They should have full protection under the Endangered Species Act. Is this another case of catering to loggers?”
- “As a resident of Idaho on the edge of grizzly bear country, I find it preposterous that Governor Kempthorne can use the argument of fear of a "massive flesh-eating carnivore" as his primary reason for objection - when all of his other actions as governor promote "risk-taking" by humans in extractive resource exploitation - timber harvest, mining, etc.”
- “Since you are the US Fish and Wildlife Service you should be protecting the interest of wildlife, not the interest of logging, mining and ranching businesses that can speak for themselves. You should live up to you promise to improve grizzly bear protections within recovery areas. I hope you place high priority on protecting our few remaining roadless areas so that our grizzlies and other wildlife have linkage zones from one area to the next.”
- “The real reason for the governor's opposition is that the timber and mining interests are opposed to the reintroduction. The bear would simply make it harder for these business interests to extract timber and mineral resources from our nation forests.”

- “...please be aware that many of us support the grizzlies' use of the land more than we support its use by livestock ranchers and farmers.”
- “I believe the actual motivation for your opposition to the plan is to insure that this Endangered Species does not gain a foothold in the region thereby precluding hard rock mining, oil and gas drilling, logging, and finally development.”
- “A priority should be given to protection our remaining roadless areas, linkage zones, and other areas threatened by the Administration's energy and logging proposals.”
- “Some of us visited Yellowstone National Park earlier this year and were alarmed by the bear-unfriendly areas created by the proliferation of ranchettes just outside the Park. If energy development and expanded logging are allowed in current roadless, wild, and linkage areas, the bears will not stand a chance.”
- “A high priority on your list, however, should be to protect our remaining roadless areas, and other areas of existing and potential wildlife habitat vulnerable to logging, off-road vehicle use, mining and energy development.”
- “It's about time that government officials stop subverting the public will and ecological good for the venal purpose of currying the favor of mining and logging interests in the Rockies. Enough is enough.”
- “Alternative 4 restores grizzly habitat by ripping out 3,500 miles of unnecessary roads to restore the habitat linkage corridors. Alternative 4 implements management by a Scientific Committee appointed by the National Academy of Sciences and would include scientists from the private sector, the US Fish and Wildlife Service, the Nez Perce Tribe, and the state wildlife management agencies in Idaho and Montana.”

EFFECTS FROM THE GRIZZLY BEARS ON WILDERNESS (508)

Several respondents highlight the benefits of the Selway-Bitterroot wilderness for its potential as a site for grizzly bear recovery. Some people believe that grizzly bear recovery will ensure this area will continue to be a wilderness area into the future.

- “The Selway-Bitterroot wilderness area has many millions of acres of public land with an abundance of bear foods and few opportunities for conflicts between bears and humans.”

- “I like having a large wilderness area available for recreational purposes without having the additional worry of contending with large carnivores who are not hunted and therefore have little fear of humans”
- “This is the largest block of the remaining wilderness left in the lower 48 and the only place to attempt reintroduction of the native grizzly bear.”
- “Reintroducing grizzly bears to the Bitterroot Ecosystem would help ensure that this area will continue to be a wilderness area in the foreseeable future.”
- “A high priority should be to protect our wilderness area.”
- “The Selway-Bitterroot wilderness is one of few ecosystems left that are relatively in tact and can continue to support all the ecosystems within it if left protected and undisturbed.”
- “If we cannot bring back grizzlies to such a remote and vast wilderness, then were can we do it?”
- “I believe that grizzly bears should be restored to Idaho to preserve the species, enhance the wilderness experience in Idaho, and to reflect the will of the majority.”

One respondent believes that having bears in the Selway-Bitterroot wilderness will restrict the use of the area. Another individual points out that the wilderness will still be there in the future.

- “We believe that having the bears in the wilderness will severely restrict everyone's ability to enjoy the wilderness.”
- “The proposed reintroduction area is Wilderness. The habitat will be there if needed in the future.”

Several people call for a balance in the ecosystem. They believe it is critical to link wilderness areas to support a healthy grizzly bear population. Some express the importance of maintaining the integrity of wilderness.

- “I certainly respect and appreciate the inherent value of having a true "wilderness" with all of the attendant original species. However, there must be a point of balance.”
- “The very nature of the wilderness implies an area that is not tailored to man's convenience or ensured safety. These are places that require taking responsibility for oneself and being "bear aware" Man is the visitor to these locations.”

- “I wanted you to know how many Americans look forward to reintroducing "wilderness" to wilderness areas.”
- “I feel that the reintroduction of the grizzly as an endangered species is vital to the maintenance of the wilderness ecosystem... These areas ought to be preserved as havens for the wildlife of North America, in some attempt to allow for the species diversity that is so critical to the survival of the planet.”
- “Our natural heritage in the West is one of the roadless wilderness containing a full complement of wildlife, including ALL predator species. Without these predators, the ecosystem does not have its natural balance. Interconnection between wilderness areas is also crucial to regaining and keeping healthy and diverse populations of these animals.”
- “Wilderness areas should be natural and reflect historic conditions. Without the grizzly bear, this wilderness area lacks a crucial link in the web of life. When I visit a wilderness area; I would like for it to have all of its necessary components for natural cycles, and that includes the grizzly bear.”
- “Perhaps you made this decision out of gut-level feeling that somehow grizzly bears are evil; that it is good they were eradicated from the lower 48 and would cause death and mayhem. While grizzlies are wild animals and do on rare occasions attack humans; we are talking about a wilderness area millions of acres in size in which nature is supposed to reign supreme. Humans are the only guests. Grizzlies are part of this ecosystem and must return for it to truly reflect both our heritage and to function at its best.”

A couple respondents point out the purpose of wilderness and wilderness areas.

- “This land is designated as federal Wilderness. Please let me point out that this is public land, which does not belong to the timber interests. It does not belong to the ranching interests. It does not belong to the outfitters, or mining companies, or the people of Idaho, or Governor Dirk Kempthorne. This wilderness belongs to the people of the United States. It is a national wilderness resource that belongs as much to the citizens of Alaska and Florida, as it does to the Idaho ranchers and loggers who make a living from our forest, yet often seem to forget that it is not their own private property. This land is designated as a national wilderness resource. It should be managed as such. An intact, healthy wilderness includes top predators. An intact, healthy wilderness does not mean an elk farm, a tree farm, or cow farm. I ask that you manage the wilderness as such, and allow sustainable uses outside of the wilderness boundary. Let good ecology decide what to let inside of that boundary.”
- “We must save the grizzly bears before it is too late. We are developing this country too fast. Everything in wilderness areas should not be about dollars and cents. Wilderness areas should be set aside for wild animals not necessarily area

accessible to humans (except for walking in these areas and walking out). Please help the grizzly bears.”

A couple respondents point out the benefits of wilderness and Grizzly Bear Recovery from their perspective.

- “As a wilderness therapist I utilize wild places to bring about change and empowerment in at-risk youth. I strongly urge you not to stop the reintroduction of grizzlies to the Bitterroot-Selway wilderness. Wild places are one of the last places where humans are visitors, not controllers and these places have a powerful affect on at-risk youth.”
- “Have you ever spent time camping or hiking in a vast wilderness area? It's hard work but oh so beneficial to your mind, body and your awakening spirit to the "beauty of the Earth". Let's not lose these truly wild places but work to support them and the fauna that were born to inhabit them.”

ECONOMIC/SOCIAL (600)

Most of the general comments pertaining to social and economic impacts and concerns are covered in codes 601, 602, and 603. However, some general comments relating to social impacts and re-evaluating the recovery plan included the following:

- “Social needs or impacts were not carefully examined or fully understood when the Plan was developed. Because of the lack of information, the public had no idea what reintroduction really meant with respect to public use of the country or how individuals conducted their affairs on private land. Many of today's regulations have been developed since the Plan, and to put it bluntly- many traditional users have been lost and other uses have been impacted to the point where many participants are discouraged from participating. In summary, there is simply too much new information available today, as well as changed conditions, to continue to proceed with an introduction in the Bitterroot without re-evaluating the recovery plan for the Bitterroot as well as the entire Grizzly Bear Recovery Plan.”

COST OF RECOVERY EFFORTS (601)

A plethora of respondents commented on the cost of the recovery efforts. Many of those respondents were adamantly against spending their taxpayer dollars for recovery of the grizzly bears. Many of these people are in support of the “no action” proposal. Several respondents feel their tax dollars would be better spent on other priorities.

- “There is no need for spending \$450,000 yearly on grizzly bears as the USFWS now does. The plan you put on hold calls for spending millions on increasing grizzly bear numbers and range and is strongly opposed by MT and ID governors and ranchers.”
- “I support the no action proposal and will support any effort to cease spending for grizzly reintroduction.”
- “Is this some kind of game we are playing here? The best two-out-of-three before we make a decision. That may be good in baseball, tiddly winks, or twister, but that is not good enough when taxpayers are footing the bill.”
- “...I am a taxpaying citizen of the United States and the State of Montana, and I resent my tax dollars being used for this kind of activity. It seems to be a big waste of my tax dollars to move these creatures from their current homes, monitor them, and hire innumerable functionaries to push paper around.”
- “After seeing how much money (taxpayers' dollars) was squandered in the wolf reintroduction program and how much it has subsequently cost us to maintain wolf packs that we also have to spend money controlling because they do what they are born to do (i.e. kill animals, be it livestock or game animals, be it livestock or game animals), I found it extremely difficult to believe someone actually was stupid enough to try the same type of fiasco with grizzly bears, again at taxpayers' expense.”
- “The argument that we should continue on this program because we have already spent money on it is a poor argument. Spending a lot of money on any project doesn't make it a good project. Sunk costs are simply not relevant when considering what should be done in the future.”
- “I applaud your decision to find better ways to spend the taxpayer's money than to encourage the proliferation of grizzly bears in the United States.”
- “The cost of reintroduction is ridiculous. Already too much money has been spent on studying this issue. As taxpayers we do not want our hard earned dollars spent in this way. Why in the world would we want our tax dollars spent on a program that will cause us numerous problems?”
- “As an "experimental, non-essential species" in the BE - meaning their survival is not essential for the survival of the species - it is the belief of IAC [Idaho Association of Counties] that the experimental reintroduction of grizzlies is not a proper way to expend limited Department and USFWS resources.”
- “... the U.S. has budget problems across a broad front. There are many high priority needs such as schools that are not being met. In the natural resource area, there are other recovery efforts such as the Columbia Basin salmon which need

increased funding and effort. I feel that the salmon are a much higher priority than the introduction of grizzlies into the Selway-Bitterroot. The Bull Trout is another high priority species. Our riparian areas in the west need a lot of work. If you have excess funds to spend, focus them on riparian work. In case you are interested, I don't even fish."

- "How about spending those millions on education or other needed areas like Social Security? Or maybe managing and preserving the wildlife we do have: elk, moose, deer, instead of introducing natural predators- grizzlies and wolves."
- "Funds that would be invested in this program would be better spent on replacing lost bighorn sheep populations from mountains scattered throughout the west, and elk to East."
- "The money you have wasted on the study, etc. of these bears would be better spent studying spotted owls, prairie dogs, and other harmless animals."
- "Funds to initiate and administer this unnecessary and unwanted program might well be better spent on schools, highways, health care and low income housing for the residents of Montana and Idaho."
- "Economic effects of grizzly bear recovery will be enormous. It is estimated that the recovery will cost \$1 million of taxpayers money per bear. Should we be spending money on this experiment when public schools are suffering due to lack of funds, people in our country are going hungry or are without funds to get needed medical attention?"
- (Governor Kempthorne's Letter)... "However, it is certain that continued efforts toward establishing the BE experimental population will siphon off funds that might be used for managing the other established bear populations in addition to other recovery commitments for fully protected species. The wisdom of channeling large blocks of FWS time and money, along with the resources of other agencies into establishing a peripheral, experimental population is highly questionable...Three of the five currently occupied grizzly bear recovery populations (Selkirk, North Cascades, and Cabinet-Yaak Ecosystems) have a combined population of only about 100 bears (FWS 1993, Mattson et al. 1995). Conversely, the Yellowstone and Northern Continental divide ecosystem populations, and FWS funding should be focused on the areas of fundamental importance associated with grizzly bear recovery within existing populations."
- (Governor Kempthorne's Letter)... "The depletion of funds that accompanies the increased management needs of a growing bear population also affects the States within which grizzlies reside. The need for additional funding will become particularly acute after the bear is delisted and the primary responsibility for management and funding is transferred to the States... Idaho thus wholeheartedly

concur with the FWS's statement that "it is neither prudent nor consistent with our recovery priorities to establish a new grizzly population in the (Bitterroot Ecosystem) at this time".... The No Action Alternative will also promote a more cost effective approach for achieving grizzly expansion into their former range within, inter alia, the Northern Continental Divide and Yellowstone Ecosystems."

Some respondents feel tax dollars should be spent on managing the grizzly bears and other animals where they are now rather than spending millions on moving them to new areas. On the other hand, some respondents feel funding should be moved away from management of the Yellowstone grizzly bear population to the reintroduction of the grizzly bears into the Bitterroot ecosystem.

- "... we oppose spending millions of dollars to reintroduce them and more millions to manage them."
- "I would like to suggest that you save your money on ridiculous programs like this and spend it on protecting lynx, wolves and grizzlies where they live right now."
- "Take the money you're spending on studying managing grizzlies in the Yellowstone ecosystem and use it to establish a grizzly population in the Bitterroot-Selway."
- "The concerns over costs (\$2.1 million over 5 years) are insignificant, considering the importance of this conservation initiative and the size of Interior's budget. We would welcome increased emphasis and funds allocated to recovery of the existing populations, but have seen no proposal to do so and note that the final EIS specified that BE [Bitterroot Ecosystem] grizzly restoration would not use funds allocated for recovery efforts on existing populations."

One respondent believes those who support grizzly bear expansion should come up with the funding to make that happen.

- "Those groups that advocate expanding Grizzly populations should be financially responsible for those expansion efforts and the end results/actions of these bears as they relate to public safety issues (human death/injuries, livestock losses, torn up camps and destroyed property). An insurance pool should be established by those "special interest groups" to provide relief for losses suffered as a result of Grizzly Bear actions, e.g. Defenders of Wildlife fund for payment to western ranchers for livestock losses done by wolves."

Numerous respondents believe funding for the project should be a leading concern in the Bush administration's budget recommendation. They believe all options for private funding should be exhausted before the Fish and Wildlife Service should cancel the project on fiscal grounds. Those who support the previous decision (Alternative 1) are upset that the reintroduction effort is being dumped for fiscal reasons. They point to all

the years and money invested thus far, and are upset that Secretary of the Interior, Gale Norton, is abandoning the grizzly bear reintroduction effort. Many supporters of the previous decision also point out the economic advantages of Alternative 1.

- “The Bush administration should allocate federal tax dollars to support this plan of grizzly bear restoration. The bears can't vote, but plenty of us who admire the grizzly do vote, and we want to see healthy grizzly communities in the lower 48 in many years to come.”
- “If funding cannot be found in the Bush administration budget for a critical project like this, and I believe it should, then options for private funding should be explored.”
- “I pay taxes and would like to see some positive results from paying them! Reintroduce the grizzly to the Selway-Bitterroot area, what we learn from there, maybe, just maybe "man" can turn his selfishness into a healthy, helping program for others to follow!!”
- “The June 22 NOI fails to disclose the investment of taxpayer dollars for the Bitterroot reintroduction that will be lost forever with no benefit to grizzly recovery or to the taxpayer!”
- “We urge you to reconsider and to take into account the many years of cooperation, progress, expense and trust already put into effort. This effort must continue to move forward.”
- “It is my understanding that thousands of dollars (and hours) have already been expended to assess whether grizzlies should be restored to Idaho; what a waste of taxpayer's money to abandon the project now!”
- “I am amazed that Gale Norton after six months of being the Sec. of the Interior can undue a decision which took seven years and \$700,000.00 to formulate.”
- “All options for private funding should be exhausted before the Fish and Wildlife Service cancels the project on fiscal grounds. Defenders of Wildlife has agreed to compensate landowners for any loss of livestock caused by grizzly bears.”
- “Perhaps most importantly, Defenders of Wildlife and the National Wildlife Federation last year met with the director of the Fish and Wildlife Service and presented her with a written commitment from a major foundation to share the cost of Bitterroot grizzly restoration on a 50/50 basis. Conservation groups have made plain to the Service that we are serious about equal sharing of the costs of the Bitterroot grizzly reintroduction, but that is never mentioned in the cost calculations.”

- “The Service has told us that reintroduction would cost approximately \$250,000 per year. If we pay half that means the Service has to come up with \$125,000, out of it's x million dollar budget to meet this important, high-visibility recovery objective. Given that the Service has spent nearly a million dollars over the last six years doing the paperwork on this reintroduction, their excuse that they have no money rings rather hallow. It's just a convenient justification for not meeting ES responsibilities.”
- “The undersigned groups respectfully request that the Department of Interior immediately consult with the North Cascades grizzly bear subcommittee of the IGBC to determine the amount of funding necessary and request a special appropriation for an NCE Information and Education program followed by a Recovery Plan Environmental Impact Statement.”
- “However, an attempt to move the project forward using the citizens management committee and experimental nonessential status of the population may have provided alternative and less expensive ways for Bitterroot grizzly bear recovery to proceed. For example, Tribal and public management involvement and responsibility could have resulted in significant donations and financial support from private and non-government cooperators and foundations.”
- “...some environmental groups are prepared to try to help fund the plan, since it seems that the secretary is opposing it partly for economic reasons. If there is any fund you have set up to take donations for this project please let me know and I will contribute.”
- “Funding for the recovery effort as proposed would be elevated through the private sector. Philanthropist Ted Turner has offered generous funds toward the Bitterroot effort. A private fund raising effort would be easy to accomplish if necessary under Citizens Management Committee oversight. This could be one of the least expensive success stories the Service ever attempted. The Service will likely spend more defending this ill thought out effort in court than what it will cost to get grizzly bears on the ground.”
- “The Service has already invested significant amounts of time and money on the environmental analysis and studies leading to the FEIS and ROD. Unfortunately, it may now find itself spending more of its limited dollars in court to defend the effort to rescind the decision than what it might cost to implement grizzly bear recovery on the ground in Idaho.”
- “I am also appalled by the dismal amount of money your department is given for bear recovery. Do you receive funds from different groups such as Wilderness Society, Sierra Club, WWF? Do you accept direct donations for the specific use of this recovery? Who would I write to concerning my vote and voice to increase these funds?”

- “Why spend millions of dollars to move grizzlies from areas where they are doing well to an area where they may not find proper or sufficient feeding areas. Would it not be wiser to spend the money to buy corridor linkages, so that grizzlies could repopulate on their own?”
- “I believe, as does Defenders of Wildlife, that your actions are despicable and illegal. If Defenders of Wildlife chooses to pursue this case in court, you can be sure I will support them. I have many friends and family members who are wildlife advocates and they will be as outraged as I am to hear of this setback. You can be rest assured that they will lend their full support to Defenders of Wildlife as well.”
- “Bringing grizzly bears back into the region has the support of the citizens of Idaho and Montana; this is, in my opinion, the primary reason the program should move forward. As a Republican, I believe strongly in local control. Although a large portion of the funding for the program would come from the federal budget, the opinions of this region must be among the primary considerations moving forward. Also, I feel it is critical that all options for private funding be exhausted before the Fish and Wildlife Service cancels the project on fiscal grounds.”

One respondent suggests the project be put “on hold” rather than going with the “no action” proposal.

- “If inadequate funding is indeed the real reason for not moving forward with the reintroduction, the Service should put the project "on hold" until funding can be obtained rather than selecting the No Action Alternative.”

One respondent believes the savings that would come from not having the annual recovery is not significant enough to warrant termination of the reintroduction effort.

- “WMI does not believe that limited recovery funding should be used as a justification for not proceeding with the BE reintroduction. Although the proposed removal of regulations and reevaluation of the Record of Decision refer in a number of instances to "our limited recovery funds" and "our available resources," as partial justification for not proceeding with the BE reintroduction, the cost to the Service and Department of the Interior to implement the BE reintroduction is just \$90,000 per year and only \$50,000 per year more than the No Action Alternative in each of the next five years. In our judgment, annual recovery funding savings to the Service of \$50,000 per year are not significant enough to warrant terminating the reintroduction effort.”

Several respondents feel the Fish and Wildlife Service has a hidden agenda to increase the agency’s budget and keep employees working. Others claim the lack of funding is just an excuse not to abide by the Endangered Species Act.

- “Grizzly bear biologists (such as Chris Servheen) simply want to perpetuate their jobs and increase funding for their programs.”
- “Lack of Funding To Initiate Reintroduction: As the Service and conservationists well know "Crying Poverty" is a time honored agency tradition when faced with a politically difficult task that they are reluctant to initiate. In most cases the agency at least requests insufficient funds, fails to support the request, and then cries poverty when the dollars don't materialize. Here, however, the Service didn't even make a pretense of seeking appropriations - essentially telling staff "if they supported reintroduction they could find the dollars in their current budget." The ESA has no exemptions for such self-inflicted funding shortfalls.”

EFFECTS ON LOCAL ECONOMY (602)

Those who favor grizzly bear reintroduction claim there will be a boost to the local economy from people wanting to see and experience the grizzly bear being in the area. These respondents point to the benefits to the ecosystem, to the communities from a boost in tourism, and to the overall wilderness experience.

- “You speak often of local input on environmental issues. I am a citizen of Idaho and have been for many years. I find that "local" input is often a euphemism for protecting businesses and other economic interest. The citizens of Idaho often voice their support for wolf and grizzly reintroduction; the timber, agricultural, ranching and mining interest oppose it. What makes their voice more 'local' or more important than mine?”
- “What will happen to tourism in Wyoming, Montana, and Idaho if potential visitors know there is no chance of seeing a grizzly bear?”
- “I live in a state where wolves have been reintroduced. I cannot explain how much it enriches the ecosystem the communities and wilderness experiences. I know that tourism is a strong provider in Upper Peninsula communities and the addition of "wolf tourists" has been a welcome presence. I believe the same could be true of Montana & Idaho (within reason & safety).”
- “This plan allowed everyone to win. Logging could continue, thereby supporting the local economy; the logging plan would provide the varied habitat required by the bears.”
- “This plan represents the best viable alternative that would economically impact people of this region.”
- “The release of bears will impact local communities in jobs provided by tourism, and in quality of life issues for local residents.”

- “If nothing else, it would be good business for region sorely lacking in financial opportunity--let's fact it, *Ursus Arctos Horribilis* has a certain celebrity status among North American wildlife.”
- “After viewing both mother grizzly bears and black bears with cubs this spring in Yellowstone and Teton Parks I have come to realize how important these magnificent animals are to our ecosystem, tourism and heritage. Viewing these large predators in their natural environment instead of a zoo is a truly awe inspiring sight. It shows us that a part of this country is still wild and free. We can experience a little of the feeling that the early explorers felt when traveling through this then vast undeveloped country. It is a feeling that we can not experience by reading, watching a movie, or seeing these animals in a artificial environment.”

On the other hand, several respondents contend grizzly bears in the area will affect the local economy negatively. These people are generally concerned with the safety of their clients and customers. They are also concerned with the economic burden local residents will carry as opposed to people who live outside the States involved.

- “Is there an ECONOMIC IMPACT STATEMENT that shows the effect grizzly bears will have on ranching, farming, logging, recreation and outfitting? We doubt that much research has been given to how reintroduction will affect the economic conditions of the Bitterroot Valley.”
- “While we did not comment on the wolf re-introduction program, we now realize that was a huge mistake. The wolves have had a very negative impact on livestock and big game animals in Central Idaho. The decrease in big game numbers has decreased the numbers of hunters traveling through Twin Falls County.”
- “If the grizzly was allowed there, then the environmental people would have one more reason to shut everything down in that area. Western Montana is already suffering severe economic depression.”
- “One of our great concerns is the economic impact upon our entire locale. A study conducted in northwest Wyoming (Anderson, et al: 1996) shows conclusively that livestock losses due to grizzly predation are often devastating to cattle producers. Lemhi County consists of an area that is 92% public lands...The Endangered Species Act has been used as a tool to severely restrict agriculture here. This has been accomplished by the reintroduction of wolves from Alberta, restriction of irrigation water to meet the theoretical needs of salmon and steelhead, and the threat of lawsuits by John Marvel to close off irrigation ditches under the guise of the preservation of bull trout...cumulative result of these actions is the uniform opinion of our residents that no more action on the part of ESA advocates is necessary. Our local economy has already absorbed the brunt of this federal onslaught, and it

remains to be seen whether this storm can be weathered...We see no way that these losses can be offset by tourism...Although it could be argued that the loss of people who venture between a grizzly sow and her cub is merely Darwinian mechanics at work, gory details of such an encounter can do little to promote tourism in the backcountry.”

- “...when the rest of the country realizes that the wilderness photographs in our vacation brochures and the mythology of the wild and rugged West is no more than a thin facade over a land of Dairy Queens, Holiday Inns, and supermarkets, the tourist industry will collapse.”
- “Importing grizzly bears into Central Idaho would have a negative impact on families who live in the general area whose livelihoods and safety have to be taken into consideration.”

SPIRITUAL/CULTURAL/SOCIAL IMPACTS IF NOT RECOVERING GRIZZLY BEARS (603)

Numerous respondents include statements in their correspondence that fit this category. Many believe the grizzly bear is a symbol of our national heritage and should be preserved for future generations. Several believe the presence of the grizzly bears in the Bitterroot Ecosystem would improve the wilderness experience for those visiting the area. Some people also say that even though they will probably never go into the wilderness that just knowing the grizzly bears are there is good enough for them. Many respondents relate experiences they have had in the wilderness and how it feeds their spirit.

- “The majestic grizzly bear is the symbol of the American wilderness. But of the 50,000 grizzlies that once roamed the lower 48 states only 800 to 1,000 remain. The last known grizzly seen in the Bitterroots occurred in the 1940's. If we cannot introduce the proposed 25 grizzlies into the 1.3 million acre Selway-Bitterroot over a period of 5 years as advised, then when, and where?”
- “According to the Wilderness Act of 1964, wilderness is set aside for present and future generations. If grizzlies are not part of Wilderness, we are not honoring this legacy for future generations.”
- “This is one of the few, a species able to capture the essence of American wilderness and reminds us of our love of exploration and appreciation of the natural world. And I find it unfortunate that the only time I have seen a grizzly bear in the wild was in Canada.”

- “We owe this reintroduction to future generations, we owe future generations so much more. Let's do the right thing--Reintroduce grizzlies into the Selway-Bitterroot.”
- “The grizzly is the ultimate symbol of the wilderness in the West; it provides many tangible and intangible benefits to any ecosystem in which it lives. It belongs in our Idaho wilderness - Montana gets along very well with the grizzly in its mountains and Idaho can too.”
- “I live in a rural area of Montana. I have never seen a grizzly bear and rarely see a black bear anymore but I like to know they're still out there in the wild of the roadless mountains and not extinct like the golden grizzlies that once roamed California.”
- “We should all be deeply concerned about the serious threats to one of the most important symbols of our wildlife heritage--the grizzly. This plan provides us with the best available option to assure that the grizzly will continue to survive for future generations.”
- “The bald eagle may be our official American symbol, but the grizzly bear is truly the real symbol of American character: wild, powerful, free. When the west was tamed, all fell in line, subservient to the pastoral, suburban American dream. But, the grizzly bear--the grizzly is no dream. It is American reality.”
- “Theodore Roosevelt, who gave us Yosemite National Park then and forever, and who always believed the American Grizzly should be the American symbol, is surely turning over in his grave as Secretary of the Interior Norton with the blessing of George W. Bush sets forth on her crusade to destroy our environments treasures.”
- “Some day I would like my children to have the opportunity to experience a "Wild America" and not have to only read about it in books and see animals in the zoo.”
- “Grizzly bears...have been targeted by our society since colonization and have been systematically eliminated based on disrespect, unfounded fears, and outright hostility for all things non-human. This anthropocentric narrow-mindedness has left our country impoverished and threatens to introduce our children to an artificial, sterile world.”
- “The grizzly bear is like the coal miner's canary, letting the miner know when he should get out of the mine for lack of safe air to breathe. It doesn't take a lot of brains to figure out that the whole planet needs us to reconsider the way we do business. Bears and their habitat are an indicator of how we value life as we know it on earth.”

- “This is what it comes down to - Are we going to have a wild west with grizzly bears, wolves, wolverines and lynx? Or are we going to have a wimpy west? To me a west without the grizzly is like Africa without the lion and the Arctic without the polar bear.”
- “...During the 40's, 50's and 60's grizzly bears frequented our property. They provided some scares...the grizzlies continued on their way after creating some disruption but causing no damage. These experiences create a heightened sense of awareness and concern about the habitat within which we lived. This wild sensation was part of the exhilaration and nature of life in this country.”
- “If you know the wonder of a night spent in the company of a wilderness that is home to the grizzly, you know the true wonder of life. You know what it is to allow yourself to let go of the human desires of control, and let yourself be at the mercy of our country's beautiful and mysterious wild places. Help to preserve this legacy.”
- “I live in the state of Idaho and I strongly urge you not to stop the reintroduction of grizzlies to the Bitterroot-Selway wilderness. I am a teacher and would like to teach my students the progression we have made toward saving animals from extinction not pushing them into extinction. They are part of our heritage in Idaho and we are proud of our state. The value of having grizzlies to many citizens of Idaho would far out weigh the danger.”

A few respondents take another viewpoint for future generations. They speak of the secure feeling they get when hiking and spending time in the Bitterroot Ecosystem without the fear of running into a grizzly bear. They want to preserve that secure feeling for future generations.

- “I backpack the Bitterroots often and would like in the future to take my grand children with me without the worry of encountering grizzlies.”
- “It is nice to have an area where people can avoid the problems associated with travel in grizzly country. You can hike and camp alone, hike in the dark in morning and evening, go off trail, and enjoy yourself more.”
- “I am a resident of Idaho and am strongly opposed to introduction of grizzlies into Idaho. The only groups who support this are environmentalists who have no concern for the citizens of Idaho who use this area...My wife and I recently backpacked on the Selway River and thankfully, we did not have to be concerned with a dangerous animal like a grizzly bear.”
- “We have resided in Salmon, Idaho...at the edge of the Frank Church Wilderness for over 30 years. The majority of our recreating time is spent on pack trips into remote areas here in Idaho mostly but some also in Montana, Wyoming, Nevada and

Arizona. We have had our fill of contending with grizzly bears in Montana and Wyoming and need a place where we can be free from the concern of their whereabouts. When we want to see grizzlies we will go to Montana or Wyoming...let Idaho remain free of them.”

Many people speak of the bear’s role in ecological balance, and because the bears were here first that balance should be even more respected. Some respondents, including some from other countries, feel the U.S. is viewed as a leader in ecological conservation. The Nez Perce Tribe speaks to the cultural benefits grizzly bear recovery would provide to the Nez Perce people.

- “We must learn to share the earth with other creatures and not arrogantly assume that human needs/greed supercedes the right of all other life forms to exist.”
- “I am 58 years old and have lived in the West my entire life. I support ecologically sound industries within the forests but I strongly believe this should not be accomplished in such a way as to deprive any animal its right to exist in a natural environment.”
- “Throughout history mankind has gone out of its way to destroy that in which it has feared and loved. This in turn, has done nothing more than to harm ourselves in the long run.”
- “I have lived in Idaho for 30 years and incidentally live on a ranch with wild turkeys, cats, bears, lynx, deer and elk. I see my responsibility as a land owner / rancher to maintain habitat for our wild heritage, and grizzly bears are historically part of the ecosystem.”
- “Our existence is directly related to the existence of these grizzlies, and all other creatures. Whenever one species becomes extinct, the circle of life has become smaller.”
- “The bear specialists group (BSG) is one of the specialists groups founded under the auspices of the World Conservation Union (IUCN). The United States is viewed as the world's leading nation in democracy, wealth and influence. We believe that the United States must also take a leading role in ecological conservation. Reintroducing grizzly bears into the Bitterroot Ecosystem would have set an important international standard for restoring and maintaining the integrity of ecosystems.”
- “As an immigrant citizen to this country, I strongly believe that this country's biggest advantage over the rest of the world consists of not its nuclear arsenal, but its natural biodiversity and the impressive landscape that supports it. It is a shame that the biodiversity that remains is but a small part of the historic flora and fauna that existed. In particular, the buffalo and the grizzly are a stark example of the hole left

by the thoughtless policies of the past. It is our responsibility to mitigate the effects of the past policies.”

- “I urge you to reconsider the decision to abandon the proposed reintroduction of grizzly bears into the Bitterroot Ecosystem. The United States does not have to take a back seat to nations such as Sweden, Austria, Canada and Italy when it comes to encouraging brown bears to repopulate areas of ecologically and socially appropriate habitat such as occurs in the Bitterroot Ecosystem.”
- “Little by little, all the "natural" areas of our great nation disappear because of decisions made by mankind and foremost our government...My ancestors, the Native Americans were treated in the same manner. They were shut out and forced to evacuate an area that they considered their homeland.”
- [The Nez Perce Tribe]... “ maintains active management interests in the natural resources that lie within our treaty lands, which include the grizzly bear recovery area in the Bitterroot Ecosystem. The Tribe fully supports the U.S. Fish and Wildlife Service's (FWS) efforts to recover the grizzly while ensuring adequate local participation in the management of the species. As such, the Tribe pursued, and continues to pursue, an active management role in the recovery of the grizzly bear for both the ecological benefits of returning the bear to its rightful place and the cultural benefits recovery would provide to the Nez Perce people.”
- “What is man without the beast? If all the beasts were gone men would die from a great loneliness of spirit. For whatever happens to the beast, soon happens to man. All things are connected” --Chief Seattle, 1854.”

Some respondents point out their continued involvement in the grizzly bear reintroduction process. They feel they have a personal investment and commitment from being involved. They feel a sense of betrayal from the proposed “no action” as it negates all their hard work and engagement over the years. Many see this surprise as a new social impact to those who have been connected in the process.

- “This decision, which flies in the face of the efforts and results to date, undermines the very backbone of the fabric of this country working together. It discourages trying to work with others to solve problems and resolve differences. Organizations and individuals will be less willing to get involved feeling it could be all wasted with one political decision. This is a big mistake and goes against the principles we work and live under in the U.S.”
- “I say that this plan -- the citizen management alternative -- serves as a bold, new solution to this very issue of citizen involvement, and will have far-reaching effects for conservation in America for generations to come.”
- “I write as a native Montanan and regular user of the Bitterroot National Forest.

I write as an average person with no connection either to industries, which rely on forest products, or to environmental organizations. I write as a father who fears the day his young children will not know the forest even as I have, wild, free, and unbroken. I write as a citizen horrified that in a representative Democracy, a careful, inclusive decision that achieves the local participation of all parties can be so easily tossed aside by new officials who did not achieve the most votes let alone a majority or mandate.”

- “I am a resident of Montana and feel that grizzlies should be reintroduced to the Bitterroot Mountains. It makes sense to put grizzlies back into their historic haunts using a citizen management approach. I trust citizens at the local level to make better decisions than federal leaders, or even state governors.”
- “If a statement of no action is spread nationwide, this will give a green light to more illegal poaching by saying that the interior secretary does not give a damn how many bears may vanish.”

One respondent believes a healthy grizzly bear population will help in the research for such illnesses as osteoporosis, fracture healing, and other metabolic bone diseases.

- I am currently conducting research at Johns Hopkins University, under the Department of Orthopedic Surgery, on bone metabolism in bears. This research has profound implications for mankind, including prevention and treatment of devastating and economically important illnesses such as osteoporosis, fracture healing, and other metabolic bone diseases. It is crucial, not only to the bears and the health of the ecosystem, to preserve and establish as many healthy populations of bears as is possible, but a healthy and genetically diverse bear population is crucial to medical research that will benefit mankind. The preservation of grizzlies is dependent on establishing this population.

Many respondents speak of the bears from a spiritual sense. Several point out that government should not play “God”.

- The Holy Bible states the God gave to man dominion over the earth and all living things. With that dominion comes the responsibility to protect the earth and living things that God created. I am opposed to Interior Secretary Gale Norton's proposal to abandon grizzly recovery...She is personally halting the citizens from their endeavors to obey God's command.
- As a member of the Mescalero Apache Tribe, I am obligated to creation and the creator to protect what is His and was given to us to learn from. Above all to be learned from this gift is respect for life - do not let us be so arrogant as to be the final

arbiter in this affair. Let us be our brother's keepers and manage well - there is so much lost already.

MISCELLANEOUS (700)

POLITICAL INFLUENCE (701)

GENERAL COMMENTS (702)

Thousands of respondents discuss this issue as it relates to the “no action” proposal and express widely divergent views. Many people from both ends of the spectrum express their exasperation with the political system and the roles played by politicians and elected officials. Several people in favor of the previous Alternatives 1 and 4 believe that state politicians, and Governor Kempthorne of Idaho in particular, are to blame for applying undue influence. They also resort to name-calling President Bush and Secretary of the Interior, Gale Norton to backup their frustrations that the previous decision is being changed. Many are angry that the administration has gone back on their commitment to put environmental laws and common sense above partisan politics. Many say the plan to recover grizzly bears was conscientiously designed by a diverse group of Montana and Idaho citizens – the kind of program President Bush has said he favors. Thousands of respondents ask that the Secretary re-consider the “no action” proposal. Others also disparage having politics instead of science be the guiding force in reintroduction and grizzly bear recovery efforts.

- “The recovery project is the result of seven years planning by your agency and was approved in November 2000. Even members of the timber and mill industries support the plan. Yet now comes Interior Secretary Norton who proposes to abandon it. As a conservation-minded citizen, I strongly object.”
- “Secretary Norton and USFWS have turned their back on the grizzly bear, the Endangered Species Act, and the will of the American people. There has been no justification for the withdrawal of the plan so it seems that Secretary Norton just doesn't care about grizzlies and other endangered species...It's a sad day for the American people and our wildlife when the administration turns its back on grizzly bears and the people who have worked so hard for and strongly support grizzly bear recovery.”
- “The Governor of Idaho is sadly attached to a paradigm that has long since changed, we don't need to "tame the wilderness", we need to restore it.”

- “I believe self interest is being placed above the requirements of the State office on both sides. It is political in nature and self-serving. Secretary Gale Norton needs to re-evaluate her stand to the reintroduction of the Grizzly Bear. She needs to listen to those professional scientists who have conducted the studies and derived the facts. Hopefully she will reintroduce the original plan to bring back grizzly bears to the Selway-Bitterroot Wilderness Area. Her political future depends on it.”
- “The governor of Idaho has misled the Secretary into believing there is no support for grizzly recovery in Idaho. As a citizen of Idaho and someone who frequents the backcountry of Idaho, I would like to see the grizzly bears restored to central Idaho. To implement the "No action" strategy would ignore the wishes of this Idaho resident and many others in this region that provided comments in favor of reintroduction during the original plan development.”
- “The decision to substitute "no action" for the plan to restore grizzly bears was made on political grounds and was contrary to the views of scientists and grizzly bear experts.”
- “Objections to the reintroduction and allegations that the Service did not follow appropriate procedures under ESA and NEPA should be left to the federal courts to determine. A decision to reverse the decision to reintroduce bears should only come as a result of litigation and a subsequent court order to do so, not as a result of a change in administration!”
- “This new proposal does not refute any statement previously issued by the government in favor of this restoration. Fish and Wildlife is proposing to reverse the recommendations of its own biologists and that of the supervisor responsible for the region. It is clear to most Americans that politics, not biology, is driving policy.”
- “It seems inconceivable to me that the recovery of the magnificent grizzly bear is being jeopardized by politicians more interested in the financial gain of their, well off, constituents, in the extractive industries, than saving this endangered animal species. Especially so since it seems to be a direct violation of the Endangered Species Act, and public opinion as assessed in the USFWS survey.”
- “Certainly, President Bush's administration will be remembered as the most environmentally destructive in US history. Allowing the citizen management plan to proceed will at least improve that image somewhat.”
- “My final point is that this reintroduction plan is a great example of cooperation and compromise. Ms. Norton's decision is not only harmful to the recovery of the grizzly bear, but also damages the consensus process. Future contentious environmental issues will only be more polarized. It is basically a bad faith decision, and destroys the trust that many of us have put into the process.”

- “We in the West who are concerned with preserving and enhancing our wonderful country cannot buckle under to Washington bureaucrats interested only in industry.”
- “I believe you should be throwing your full support behind this reintroduction program, rather than allowing yourself to be swayed by individuals like Governor Dirk Kempthorne of Idaho, who demonstrated his bias against bears and his limited knowledge of ursine biology when he referred to grizzlies as "massive, flesh-eating carnivores."
- “It is unfortunate that the Governor of Idaho has chosen to oppose a scientifically based recovery action that enjoys broad public support. The State of Idaho could have taken a leadership role and demonstrated the flexibility of the ESA and an ideal citizen-based model to be used here and elsewhere for large, wide-ranging carnivore conservation as well as other contentious species. The Governor has instead misrepresented the threat and human safety issues posed by grizzly bears and the reintroduction project, played upon people's fears, and has done an injustice to truly understanding the grizzly bear and its place in Idaho's wilderness ecosystems.”
- “To scrap the plan at this time, simply because the anti-environmental, right-wing Governor of Idaho doesn't like it, is undemocratic and is nothing more than political cronyism at its worst. But, what more could we expect from Secretary Norton, formerly of the Mountain States Legal Foundation, and the right-wing fringe politicians who pull her strings?”
- “Obviously, under the current administration in Washington, the word of the Governor of Idaho will carry great weight. But, it is also obvious to me that, in regards to grizzly bears, he doesn't know what he is talking about.”
- “I wish to protest, in the strongest terms, the "bushwhacking" of the Idaho Grizzly Bear Recovery plan. The "rape and pillage crowd" headed by Dubya is at it again-ignoring the wishes of the majority (74%) in order to curry favor with their buddies in the extractive industries. The president and the vice-president are merely puppets of the oil, gas, lumber, etc. industries.”
- [Predator Conservation Alliance]... “ is strongly opposed to the proposed policy change to the "no action" alternative. Restoring grizzly bears to Idaho is too important to be sacrificed for political reasons. It is a misuse of power to contravene the Endangered Species Act, the scientific community and the majority of the public, all of whom support the restoration of grizzly bears to their former range in Idaho (62% of people local to the area, and 74% of people nationwide favor grizzly recovery in Idaho, according to a poll contracted by the Fish and Wildlife Service).”
- “I think you should know that not all of the citizens of Idaho agree with our Governor.”

- “Despite strong bipartisan support, including that of former Montana Governor Mark Racicot, Governor Dirk Kempthorne had filed suit to stop implementation of the plan. False fears and the whim of a single governor should not trump sound science and a plan that can unite people in restoring America's wildlife heritage.”
- “As a biologist, sportsman and citizen, I am totally amazed at your move to stop the reintroduction of grizzly bears into parts of Idaho and Montana. ... As a Republican that has strong conservation ethics, this administration is not pushing me to support a future candidate that will pursue a strong conservation ethic...”
- “I fail to understand your short-sighted decision to stop the plan to reintroduce grizzly bears into the Selway-Bitterroot wilderness area. Your action has only confirmed my impression that you and the Bush administration are pawns of special interests and look at environmental issues as a political problem...”
- “We call on this corruption of our government to stop and to begin listening to the American people instead of those who seek to exploit, plunder and profit from our public lands at the expense of citizens and taxpayers everywhere. It is high time to end the selfish and money grubbing ways of the Bush league and restore the grizzly to its former range and ensure its survival for future generations.”
- “The reintroduction plan is not popular in Southern Idaho, however, and politicians who oppose it score political points. I do not believe the Fish and Wildlife Service should abandon its sound plan for grizzly bear reintroduction to appease local politicians, including Idaho's Governor. If conservative politicians in Idaho had their way, a great deal of Federal involvement in many areas would be vastly reduced. In some ways it is hard to determine which they oppose more- grizzly bear reintroduction or the Federal Government.”
- “I was deeply troubled by coal lobbyist Thomas Sansonetti's statement, quoted in the New York Times yesterday, that Norton is to be lauded for her disregard of scientists. As she put it; "There won't be any biologists or botanists able to come in and pull the wool over her eyes.”
- “I am amazed that Gale Norton after six months of being the Sec. of the Interior can undo a decision which took seven years and \$700,000.00 to formulate.”
- “As director of the Colorado Wildlife Federation, I am concerned about the apparent intent of the Bush Administration to ignore public comment on issues like grizzly reintroduction...”
- “Grizzly bears ought not to be treated as political footballs to be kicked back and forth across the ideological field. However, should Ms. Norton's proposal be adopted, I will surely lend my financial support to any lawsuit to overturn such a

shortsighted and irresponsible decision. What a way to govern! Subvert the will of the people and force them to sue their own government in court.”

- “I was shocked when I heard that the reintroduction of grizzlies in Idaho was halted by the Bush Administration. This "no action" which comes on the heels of the backtracking on the snowmobile ban and the roadless forests plan and increased emphasis on oil and gas drilling in the Northern Rockies, shows that the Greater Yellowstone Ecosystem is under assault.”
- “I have been a Republican for many years. One of my main arguments to the liberal left is that we Republicans are not in favor of the Government running everything. But rather, we support local citizens and local governments to make the decisions. After all. That is what freedom is all about. And now I sit here with nothing to say to them. Why? Because you are killing the Selway-Bitterroot grizzly reintroduction plan. This plan has been carefully thought out and researched for the last 7 years. By LOCAL citizens, the communities and governments that will be affected by it, as well as the industries that have a stake in the area. This is conservative based forward movement if I have ever seen it. Please send me a response to give to my liberal friends when they ask why the Republicans who are supposedly in favor of local authority, are "stepping" in like big brother again.”
- “It's ironic that, on the same day Ms. Norton announced this decision, even Terry Anderson - the free-market economist and western property-rights advocate from Bush's transition team who championed her appointment - was praising the Selway-Bitterroot grizzly plan in Washington, DC. Dr. Anderson devoted special attention to the grizzly plan because of its innovative collaborative approach and consideration of local concerns.”
- “Please, please reconsider Secretary Norton's decision on this matter. In rejecting this plan you are rejecting the first decentralized biodiversity management plan that fits into the Republican agenda. You have a unique opportunity here to break down traditional stereotypes of Republicans as anti-environmental and to establish a goal oriented, community based Republican approach to environmentalism.”
- “Proposing to reverse the outcome of a thorough EIS process with a 2-page notice containing ill-defined references to "recovery priorities" and "objections of affected states" smacks of the Chinese way of doing things. It is a comparison that you should not find flattering.”
- “How disillusioning when powerful government figures overthrow the painstaking work of the communities. Actions like Secretary Norton's go a long way toward explaining why our children are sour on government and why "politician" is a word evoking scorn and disgust.”

- “Secretary Norton--otherwise becoming know as "do-nothing Norton" is listening to business interests and not all the information gathered during the public comment period. On top of that the governor of Idaho in declaring grizzly bears as "man-eating carnivores" obviously shared his ignorance of typical grizzly bear behavior and diet.”
- “Reversing the decision to reintroduce grizzly bears into the Bitterroots is, I think, even worse than not having made the decision in the first place: this reversal conveys to the rest of the world that although the reintroduction (1) is a biological imperative, (2) could be conducted in an area and in a way that had minimal effect on people, (3) would be monitored by the very groups that were concerned over potential impacts, and (4) was viewed as important by a vast majority of the American public, a new political administration could stamp it out.”
- “I always thought myself a Republican but the current administration's behavior is a throwback. The President just doesn't get it and I feel he is out of touch with the mainstream of public opinion. I like to think he was a Bush similar to his father but he is not; he is a shrub.”

A few people express their fears of “hidden agendas” by pro-grizzly advocates to “lock up the land”. Many respondents resent people outside the local area having undue influence on bringing grizzly bears into the areas where they live. Some respondents are supportive of Idaho’s Governor Kempthorne and his fight against the grizzly bears.

- “Three cheers for Idaho's Governor Dirk Kempthorne who has not been afraid to fight against the grizzlies. The forest belongs to all of the citizens of this country, not just the environmentalists.”
- “In the public meeting in Hamilton in 1997 speakers were "screened" and those "chosen" to speak were given 5 minutes to discuss a very important and complex issue. In this meeting, we believe the deck was stacked so that the media would report that many citizens support reintroduction. If you really want to know the truth, we challenge you to send a survey to every household in the Bitterroot Valley.”
- “I would like to extend a thank you to Gale Norton, secretary of the interior, for her courageous and correct decision in shelving the grizzly reintroduction plan in Idaho.”
- “Since taking office President Bush and Interior Secretary Gale Norton have repeatedly said they are committed to listening to state and local entities in the establish of public land policy. Our proposal to withdraw introduction of the grizzly bear appears to be a good example of that commitment. We are very pleased to see that and commend you for making that decision. The U.S. fish and Wildlife Service lost a great deal of credibility in our eyes during the Clinton administration by

turning it's back on local opposition to the administration's proposals. It is difficult to regain that credibility once lost, but this is one positive step in that direction.”

- “We are in accord with Secretary Gale Norton's ideas on the grizzlies in addition to her other views on the wilderness and environmental issues. We hope that she will prevail and not give in to the scientists.”
- “I live 12 miles south of Salmon, Idaho and my life has been adversely affected from your cramming wolves down our throats!! It would be much worse for those of us who live here, if you also forced grizzlies on us. Thank you President Bush and Sec of Interior Gale Norton & Idaho Governor Kempthorne for your assistance in keeping these dangerous bears out of my yard!!”
- “Thank God someone in Washington is finally displaying signs of having some common sense and stopping this scheme to populate our mountains with a huge carnivore.”

One respondent is against the previous Alternative 1 because of the citizen management committee. This person feels the committee would be comprised of political appointees.

- “Alternative 1 is more anti-bear and anti-habitat than it is recovery. There is no provision in the ESA for the selection of a citizen management committee as proposed by the Roots plan. This misnamed committee is not citizen management but a committee of political appointees. It is illegal.”